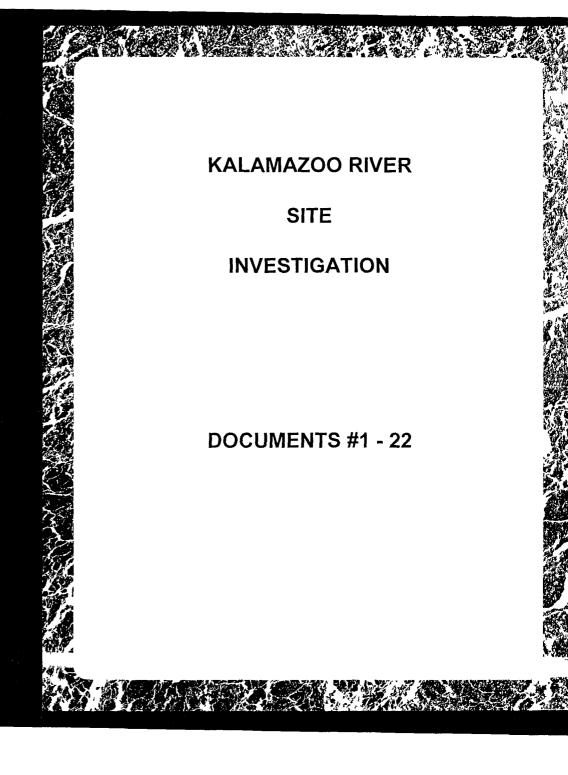
EPA Region 5 Records Ctr. 202465

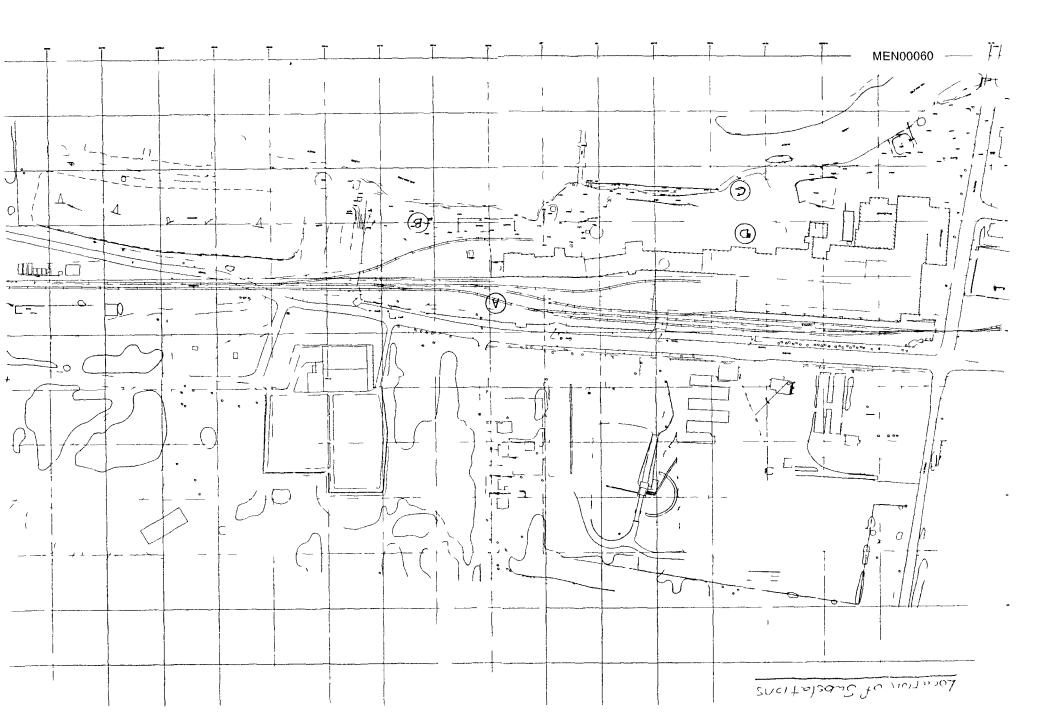
1995 STATE RESPONSE

DOCUMENTS 1-22



LOCATION OF SUBSTATIONS

DOCUMENT #1



UST GASOLINE TANKS REMOVAL REPORT

DOCUMENT #2

FORM 56+

MEN00062

MEN00062

MEN00062

MEN00062

CORPORATION

TO:

SUBJECT:

John Blauwkamp

DATE: August 27, 1986

Gasoline Tank Removal

Gary Roys

FROM:

anc.

On Friday, June 6, 1986, the 1000 gallon and 550 gallon tanks used to hold unleaded, and lead gasoline were dug up and removed. These tanks were located off of Farmer St. next to the existing garage. The tanks were emptied by Ridderman and Sons, and dug up and removed by Cushman Construction. After empting the tanks, dry ice (solid carbon dioxide), one (1) cubic foot, was added to each tank. They were then dug up. After each tank was lifted from the hole, they were inspected for leaks and photographs taken. No leaks were observed in either tank. Further, soil underneath each tank was examined and the odor of the soil was observed. In both cases no detectable gasoline odor was noted. Soil samples were also taken for VOC testing and sealed lyn mason jars. The tanks were hauled away by Cushman Construction who purchased these tanks (see attached receipt).

VOC analysis done by Prein & Newhof were negative for the soil samples (see attached sheet).

cc: John Bonham

Attachment

k j

Combinant Estimates
500 gal TANK \$ 710

ı	NO
	Juc 6 19.26
RECEIVED FROM Conh	mac Construction
Twenty and bolion -	DOLLARS
(1) 1,000 cm Non ach (1) 55	Degallar undergrand type tanks
Account Total \$ 20.00	9 90
Amount Paid \$25.00	2
Balance Due \$	Jan 20 11111111
"THE EFFICIENCYSLINE" AN AMPAD PRODUCT	\mathcal{G}

(Egg) Krongs

MEN00063



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N.E., GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E, HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

H EDWARD PREIN PE., R.L.S.
THOMAS NEWHOF PE.
WILSON D. McQUEEN P.E.
LARRY D. WILSON P.E.
MICHAEL S. FULLER P.E.
PHILIP C. GLUPKER P.E.
JAMES A. COOK P.E
ROBERT J. VANDER MALE P.E.
RICHARD L. SERBOWICZ P.E.
ARTHUR W. BRINTNALL R.L.S.
REX A MILLIPON R.L.S.

July 22, 1986 77129

Mr. Mark Reed Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Soil samples received 6/10/86 Labelled "1000 gal" and "550 gal" To be tested for gasoline

LABORATORY RESULTS

	Sample_#	
<u>Parameter</u>	1000 gal Tank	550 gal Tank
Benzene, ug/L	≪1	<1
Toluene, ug/L	<1	<1
Ethylbenzene, ug/L	<1	<1
Xylenes, ug/L	<1	≪1

PREIN & NEWHOF

Uane Hoch Chemist

Lab Log #756,757 JH:sa

UST DIESEL TANK REMOVAL REPORT

DOCUMENT #3

ITI Tank Closure Otsego, Hichigan November, 1987

The closure work, including tank removal and soil excavation, at the Otsego mill site was completed November 20, 23, and 24. The removed 12,000 gallon tank was operated by Henasha Transport out of Heenah, Wisconsin. The removal was in accordance with Purchase Order #805355.

The tank, which was abandoned by excavation and removal, has a volume of approximately 12,000 gallons. The tank was located in the northwest section of Lenasha's property in Otsego in the southwest corner of the chipyard, hap I depicts the tanks location in relation to the buildings in the chipyard. The tanks were introduced approximately 12 years ago and of black coated steel. The tank stored diesel ruel for use by HTI.

Prior to site closure, a copy or the general specifications for abandonment of underground tanks was submitted to A.P.E.C. or Mattawan, Michigan ([616]343-0000). Therefore, perore A.P.E.C.'s arrival on-site, it was Menasha's understanding that the specifications had been read. A copy or the general specifications is attached to this report.

Prior to arrival on site by A.P.E.C., the gas company and water company marked the lines between Farmer Street and the chipyard building. The power and electrical hook-ups for the semitrailers were disconnected by Henasha personnel prior to excavation.

The crew arrived at Menasha by 9:30 a.m. on Friday, Movember 20, 1987. The weather was cold and snowy, with intermittent sunshine through the overcast sky.

Photographs 1 through 48 illustrate the closure process for the underground tank. Photographs 1 through 5 show the construction of a berm lined with an impermeable memorane, to be used for storage of contaminated soils. The berm was constructed west of the tank location and chipyard house. An additional area for contaminated soil was constructed on the north edge of the tank. Photographs 6 through 8 depict the removal of the remaining fuel from the underground tank to the tanker truck. Approximately 456 gallons of both sludge and usable fuel was transferred. The pumped fuel was added to the top of the intermediate liquor tank at the tank farm on Henasha's property. Photographs 9 and 10 show the line from which fuel was pumped from the tanker to the farm.

The old pump from the tank was completely dismantied. Photograph 11 shows the former location of the pump.

Page 2

The backhoe operator then excavated the surface materials to the south of the tank along the length or it (Photograph 12). During excavation soil samples were inspected visually and through olfaction. The backhoe operator continued to expose the south side of the tank to the base of the tank (Photographs 13 through 15). Photograph 16 depicts the bottom edge of the tank on the south side.

The dark soils towards the surface in Photograph 17 contain some concentration of fuel oil. Samples analyzed from the surface of the southeast end showed 20 - 40 ppm of ruel in the soil. Contaminated soils were only found near the surface. Clean soils were experienced towards the lower half of the tank. The surface down to the dark layer in Photograph 18 contains some level of fuel.

All suspected contaminated soils were placed on Visquine in the berned area. Soils along the base or the tank (Photograph 20) were tested by <u>Paul Lassoth</u> of the EDMR and deemed clean.

The area around the hole was blocked off with yellow CAUTION tape (Photograph 21) and later that evening, circled with a show fence (Photograph 22 and 23). The lights on the backnow were left flashing to warn anyone in the area.

The soils on the north pile were covered and the edges cured to prevent leaking of contaminants further into the area (Photograph 24). Paul also determined some of the soils on the west visquine and the pile west of that were acceptable for placement back in the hole (Photograph 25).

The crew returned Monday, November 23. Clean soils on the west storage pile were removed so that the bermed area could be further used for any contaminated soils found (Photographs 26 - 28).

At 10 a.m. the remainder of the tank excavation began. Photograph 29 of the west end of the tank snows early stage or tank deterioration in exposure of bare steel along the eage and rusting. A chain was placed through the old fill pipe and vent pipe holes on the west end of the tank (Photograph 30). The tank was determined to be of sound construction in order to lift it in this manner (Photographs 31 and 32). There was no apparent moisture around the base of the tank before lifting, therefore suction was not a significant factor. During lifting it was noted that the tank has a moisture line only along the bottom base of the tank that had remained in the ground over the weekend (Photograph 33). This is most likely due to weather conditions or soil moisture rather than groundwater influences.

Page 3

By rolling the tank to the south from the noie, only one side of the tank required excavation of background materials. Care was taken by the operator to assure it did not roll completely over, therefore preventing any remaining sludge in the bottom of the tank from spilling onto the ground (Photographs 34 - 37).

Paul Massoth, Michigan DMR, noted fuel oil in the first two and one-half feet (Photograph 38, Part 1) and approximately 1 - 2 ppm in Part 2 of Photograph 38. There was no discernible odor at the east end of the hole only the west end. Paul agreed to allow Menasha to leave this material in place until the summer at which time the whole area will require surface excavation.

All contaminated soil is this area was due not to a realing underground storage tank but rather due to improper rueling practices by ATI operators. During site restoration the summer of 1988, ATI will be expected to assist in creanup costs.

Photograph 39 depicts the soils beneath the removed tank (looking west).

Photographs 40 through 44 show the process or loading the tank onto the trailer. The removed tank had a diameter or nine reet and a length of 25.4 feet. Once on the trailer, the tank was bunkered and chained to prevent any movement during transport to A.P.E.C. site. The tank and trailer were stored to the east of the chipyard house until removed (Photograph 45).

Four loads of fill were brought from Menasha's property. The smaller backhoe was used to push the rill material into the note. The site was once again renced off with an orange show rence and yellow CAUTION tape at the end of the day (Photograph 46). The lights on the backhoe were left riashing until the crew returned the following morning (Photograph 47).

The crew arrived at 9 a.m. Tuesday morning. The remaining four loads of fill for the hole were brought in from Smith's. The site was filled and regraded using the backhoe (Photographs 48 and 49). The site was not periodically compacted, therefore settling should be expected. The surface was not souded or seeded due to the reworking of this area in the summer.

All contaminated soils (100 cubic yards) were taken to the Westside Landfill in Three Rivers, Michigan. The letter for disposal approval and a dump slip are included in the Λ_{PP} endix.

The tank was hauled to A.P.E.C.'s site for cleaning and cutting. A.P.E.C. has a bermed area with an impermeable liner which they use for placement of the tank during cleaning. The tank was cleaned, cut up, and disposed of at a local scrap yard.

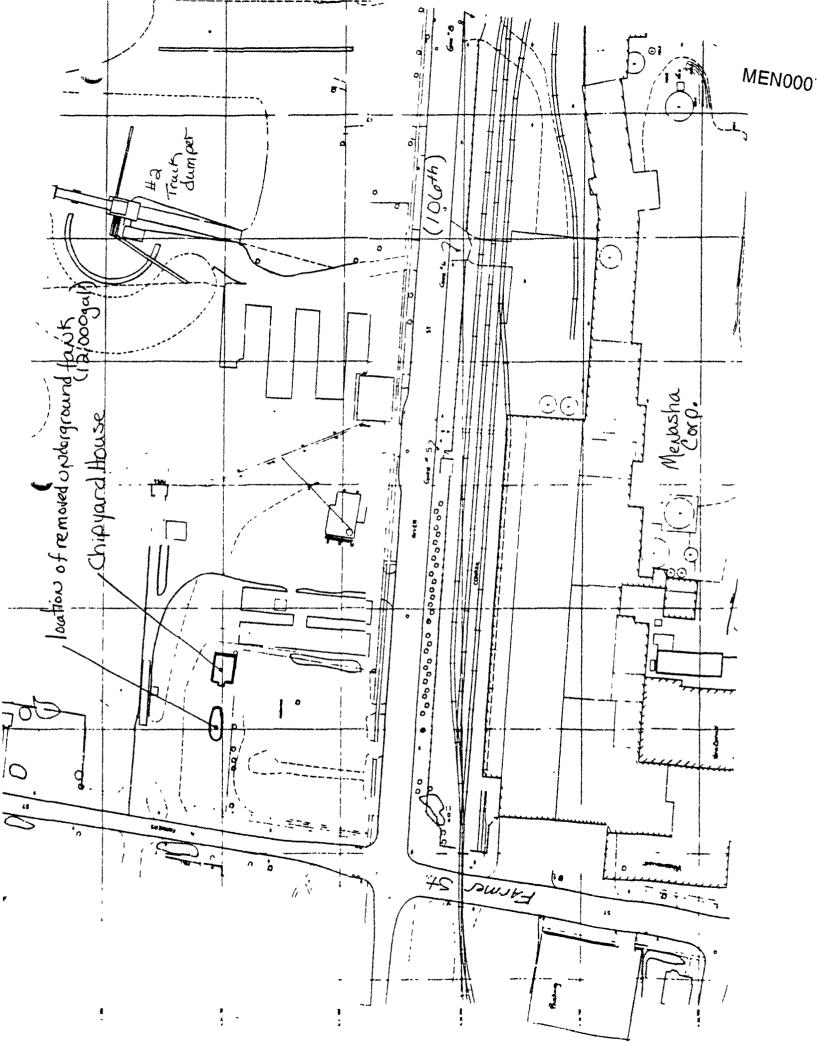
Page 4

Once the tank left the Benasha facility, A.P.E.C. became owner of the tank.

SJ/jj

NTITANK.CLO

cc/ Lyle Zulegar Keith Kling





TO:

John Blauwkamp - Otsego

DATE:

November 11, 1987

SUBJECT: UNDERGROUND TANK OTSEGO

FROM:

Lyle Zuleger

cc: Ed Fetzer

Arens Equipment is ready to remove the tank in Otsego. I gave them your name and number to work out some details. The two items in question on the quote - removal of contaminated soil and sludge in the tank will be handled as follows:

- 1. Contaminated soil taken to a Type II dump site in Grand Rapids for \$35.00 per yard.
- 2. Sludge in tank taken to a disposal sight in Detroit for .45 per gallon plus \$115.00 per hour trucking cost with a maximum of 10 hours. Proper documentation of disposal will be provided by hauler.

The cost for tank removal, sludge disposal and tank disposal and all documentation should run \$4,285.00. The soil would be extra as I stated. Please let me know if this meets with your approval so I can request an E. A. and P. O. for the project.

Lz:ph

hile.

This proposed is receptable. Fil. when the C.C.

11/16/87

November 24, 1987

Westside Landfill Three Rivers, MI. 49093

Dear Sirs:

At the request of the Michigan Department of Natural Resources, contaminated soil from an underground tank removal requires proper disposal at a approved disposal site. The tank from the property of the Menasha Corporations Otsego Mill, contained diesel fuel. The removal of the tank and associated soils was completed by the A.P.E.C. of Kalamazoo who have the consent to haul less than 100 yards of fuel contaminated soil to the Westside Landfill if acceptable.

Thank you for your cooperation.

Sincerely,

Sandra Jones

Corporate Environmental Engineer

/ac



March 9, 1989

Chris Canigleo
Westside Landfill
P.O. Box 350
Three Rivers, MI. 49093

Dear Chris,

A typographical error was made on the letter I sent to you on March 6, 1989. On the third line it states that material was disposed of at "our" facility. It should have read "your" facility. To avoid major concerns about this in future years, please note this correction on your copy.

Sincerely,

Otsego Paperboard Division

Keith Kling

Environmental Supervisor

cc: Michigan Disposal Mike denOtter

John Bonham John Blauwkamp Sandra Hoffbeck

/ac



MENASHA CORPORATION

PAPERBOARD GROUP

Chris Canigleo
Westside Landfill
P.O. Box 350
Three Rivers, MI. 49093

March 6, 1989

Dear Chris:

In November of 1987 Menasha Corporation of Otsego took out an underground tank. The surrounding soil was contaminated with diesel fuel and was disposed of at our facility (see attached letter). We are now making a final cleanup of this area and wish to bring the rest of this material to your landfill. The material in question consists of fuel contaminated sand and gravel as well as concrete and wood from a demolished building at this site. A small amount of oil dry used to soak up clean hydraulic oil would also be included. There will be approximately 50 yards in total.

All of the above listed material is considered to be non-hazardous. Upon your approval I will contact Michigan Disposal who will transport it to your site.

Sincerely,

Otsego Paperboard Division

VKeith B. Kling

Environmental Supervisor

Enclosure

cc: Michigan Disposal Mike denOtter John Bonham John Blauwkamp

Sandra Hoffbeck

/ac



August 29, 1989

Mr. Keith Kling Menasha Corporation 320 North Farmer Street Otsego, Michigan 49078

Dear Mr. Kling:

Pursuant to our recent telephone conversations. STS has developed a cost estimate for monitoring of soil removal at the Otsego Paper Board Plant. This work will be performed in the area of former diesel fuel station.

In 1987, STS attempted to perform hand auger borings in this area to estimate the presence and extent of any petroleum products. Due to the presence of gravel and compacted soil, STS could only advance three (3) borings between 2.0 and 4.5 feet. The soil samples collected were scanned with an HNU Systems, Inc. photo-ionization detector (PID) to evaluate for the presence of volatile organic compounds. Positive response were recorded on the PID to a depth of 4.5 feet. As only 3 hand auger borings were performed to only shallow depths, STS cannot accurately estimate the volume for excavation.

During excavation, STS will supply field personnel to monitor excavation soil with the PID meter and aid in collection of soil samples for chemical laboratory analysis. Presently, we estimate two days of field work for one person will be required to complete the soil excavation. In addition, four (4) soil samples will be collected at completion of excavation, to be analyzed for benzene, toluene, ethyl benzene, total xylene (BTEX), and total petroleum hydrocarbon by gas choromatography. Upon completion of the soil removal monitoring, STS will submit a brief letter report summarizing the field monitoring and chemical analysis. Table 1 presents a summary of the estimated costs.

Table 1
Cost Estimate for Soil Monitoring

On-site monitoring (2 days on-site)	\$1,530.00
Chemical Analysis (4 soil samples for BTEX	
and total petroleum hydrocarbon)	850.00
Letter Report	800.00
Project Management	400.00
Subtotal	\$3,580.00
Insurance Liability Surcharge (7.0%)	250.00
Total	\$3,830.00

STS Consultants Ltd.
Consulting Engineers

Mr. Keith Kling Menasha Corporation August 29, 1989 Page 2

The cost estimate quoted above represents our best estimate of the effort involved. Our services for the above scope of work will be invoiced monthly, with payment due upon receipt at the standard rates shown on the Fee Schedule presented in the appendix. A cost estimate of \$3.850.00 has been established for this project, on a time and materials basis. An insurance surcharge of 7.0% has been added to the cost estimate to cover work of this nature. If other items are required because of unexpected field conditions, or because of requests for additional services, these would be invoiced in accordance with the attached Fee Schedule. For modifying or expanding the extent of the work scope, Menasha Corporation would first be informed of our intentions. Review and authorization would be requested prior to proceeding with additional services.

Pursuant to the STS master contract, your acceptance of our proposal confirms that the terms and conditions are understood, including payment to STS COnsultants, Ltd. upon receipt of the invoice, unless specifically arranged otherwise in writing. If we are given verbal notification to proceed without first receiving a signed copy of this proposal, it will be mutually understood that both of us will, nonetheless, be contractually bound by this proposal, even in the absence of written acceptance by you.

If you have any questions concerning this work, please contact us at (517) 321-4964.

Sincerely,

STS CONSULTANTS, LTD.

Anne M. Murray
Hydrogeologist

AMM/kil AMM6 14

Bernard B. Sheff, P.E. Senior Project Engineer Area Manager

ACCEPTED BY:

Firm

Signature

Title

Date

© Copyright, STS Consultants, Ltd., 1989



Mr. Chris Canigleo Westside Landfill P.O. Box 350 Three Rivers, MI. 49093

September 1, 1989

Dear Chris:

Menasha Corporation is presently undertaking further clean up of soils around some of our equipment at the mill. The first area of concern involves clean sand and gravel contaminated with diesel fuel. In March of this year, we did part of this clean up bringing about 50 yards of material to your facility. It is our intention to complete cleaning of this area at this time, by removing all contaminated soils down to the level of detection with an HNu meter. Depending on the meter readings, we could be removing anywhere from 400-1000 yards of material.

The second clean up area involves soils around our #2 truck dumper. This soil has been contaminated with Mobil DTE 13 hydraulic oil. Tests show the levels of oil in the soil run from 13 ppm to 22,000 ppm. Because there are buildings in this area, the amount of soil to be removed has not been determined yet, however it will be several hundred yards. I have included MSDS sheets for both the diesel fuel and the hydraulic oil.

All of the above listed materials are considered to be non-hazardous.

Upon your approval, I will begin the diesel fuel project immediately, with the hydraulic oil project scheduled near the end of September.

Sincerely,

Otsego Paperboard Division

Keith B. Kling

Environmental Supervisor

Weith B. Klima)

cc: John Bonham Ron Thaxton Mike denOtter John Blauwkamp Jay Thiessen

KBK: amc



MEN00078

MANUFACTURER: Amoco Oil Company 200 East Randolph Drive Chicago, Illinois 60601 EMERGENCY HEALTH INFORMATION: (800) 447-8735 EMERGENCY SPILL INFORMATION: (800) 424-9300 OTHER PRODUCT SAFETY INFORMATION: (312) 856-3907

IMPORTANT COMPONENTS: Petroleum distillate.

WARNING STATEMENT: Warning! Combustible. Harmful or fatal if swallowed and/or

aspirated into lungs. Can cause skin irritation upon prolonged or

repeated contact.

APPEARANCE AND ODOR: Clear, bright liquid.

HEALTH HAZARD INFORMATION ___

EYE

EFFECT: No significant irritation expected.

FIRST AID: Flush eyes with plenty of water.

PROTECTION: None required; however, use of safety glasses is good industrial practice.

SKIN

EFFECT: Can cause skin irritation on prolonged or repeated contact. See

Toxicology Section.

FIRST AID: Wash exposed skin with soap and water. Remove contaminated clothing.

including shoes, and thoroughly clean and dry before reuse.

PROTECTION: Wear protective clothing and gloves if prolonged or repeated contact is

likely. Avoid prolonged or repeated skin contact.

INHALATION

EFFECT: None expected under normal conditions of use. See Toxicology Section.

FIRST AID: None required.

PROTECTION: None required for normal conditions of use. Use with adequate

ventilation.

INGESTION

EFFECT: Low viscosity product. Harmful or fatal if swallowed and/or aspirated

into lungs.

FIRST AID: If swallowed, do NOT induce vomiting. Get immediate medical attention.

	FIRE AND EXPLOSION INFORMATION
FLASHPOINT:	110°F, (TCC) Minimum
FLAMMABLE LIMI	TS: UPPER: 6% LOWER: 1.3%
EXTINGUISHING	MEDIA: Agents approved for Class B hazards (e.g., dry chemical, carbon dioxide, halogenated agents, foam, steam) or water fog.
UNUSUAL FIRE A	ND EXPLOSION HAZARDS: Combustible liquid.
PRECAUTIONS:	Keep away from ignition sources (e.g., heat and open flames).
	REACTIVITY INFORMATION
STABILITY: St	
	CHEMICAL AND PHYSICAL PROPERTIES
BOILING POINT:	300°F TO 580°F, Range
SOLUBILITY IN	WATER: Negligible, below 0.1%
SPECIFIC GRAVI	TY (WATER = 1): 0.81 TO 0.85
VISCOSITY: 1.	4-2.2 CS @ 100°F.
·	STORAGE AND ENVIRONMENTAL PROTECTION
STORAGE RECULT	PEMENTS: Store in combustible liquids storage area.

SPILLS AND LEAKS: Remove or shut off all sources of ignition. Use water spray to disperse vapors. Treat as an oil spill. Contain and remove by mechanical means.

Enclosed-controlled inconeration is recommended unless directed otherwise by applicable ordinances. WASTE DISPOSAL:

SPECIAL PRECAUTIONS: Avoid strong oxidizers.

PAGE 03 OF 04

MEN00080

TOVICO	LOGICAL	INFORMATION
IUXIUU	LUGILAL	. INTUKMATIUN

EYE: Primary irritation scores for similar materials have ranged from 0.0 to 1.0/110.0 (rabbits).

SKIN: Similar products have produced primary skin irritation scores ranging from 0.67

to 6.1/8.0 (rabbits). Dermal LD50 for similar materials was greater than 2

g/kg (rabbits).

INHALATION: LC50 for a similar material was greater than 10.27 g/m3 (rats).

INGESTION: Oral LD50 for similar materials was greater than 5 g/kg (rats).

From skin-painting studies of petroleum distillates of similar composition and distillate range, it has been shown that these types of materials often possess weak carcinogenic activity in laboratory animals. Therefore, there may be a potential risk of skin cancer from prolonged or repeated skin contact with this product in the absence of good personal hygiene. This particular product has not been tested for carcinogenic activity, but we have chosen to be cautious in light of the findings with other distillate streams.

Occasional skin contact with this product is not expected to have serious effects, but good personal hygiene should be practiced and repeated skin contact avoided. This product can also be expected to produce skin irritation upon prolonged or repeated skin contact. Personal hygiene measures taken to prevent skin irritation are expected to be adequate to prevent risk of skin cancer.

Materials of this type have been shown to produce kidney damage in male rats following prolonged inhalation exposures. These kidney effects are very similar, if not identical, to those produced by various petroleum naphthas and gasoline blends. The significance of these findings in terms of human health is uncertain since the male rat appears uniquely prone to kidney damage following exposures to a variety of hydrocarbon materials. The American Petroleum Institute is presently conducting an intensive research program to determine the relevance, if any, of the kidney damage in male rats to human health. Although we do not believe these materials pose a serious human health risk, until additional information is obtained we recommend that users be cautious and avoid prolonged breathing of vapors.

REGULATORY INFORMATION			
OSHA HAZARD COMMUNICATION STANDARD: Combustible liquid.			
	DOT PROPER SHIPPING NAME (BULK, LAND): Fuel Oil, Diesel, Combustible Liquid, UN1993.		
ISSUE INFORMATION			
			

BY

Stephen A. Elbert Mgr., Product Safety & Toxicology

Should Slant

ISSUED: January 17, 1986 SUPERSEDES: April 29, 1985 This material safety data sheet and the information it contains is offered to you in good faith as accurate. We have reviewed any information contained in this data sheet which we received from sources outside our company. We believe that information to be correct but cannot guarantee its accuracy or completeness. Health and safety precautions in this data sheet may not be adequate for all individuals and/or situations. It is the user's obligation to evaluate and use this product safely and to comply with all applicable laws and regulations. No statement made in this data sheet shall be construed as a permission or recommendation for the use of any product in a manner that might infringe existing patents. No warranty is made, either express or implied.

Mobil

MUBIL CIL CORPORATION MATERIAL SAFETY DATA BULLETIN

MGSIL DTE 13 HEALTH EMERGENCY TELEPHONE: SUPPLIER: (212) 383-4411 MOSIL DIL CORP. CHEMICAL NAMES AND SYNONYMS: TRANSPORT EMERGENCY TELEPHONE: PET. HYDROCARBONS AND ADDITIVES (800) 424-9300 (CHEMTREC) USE OR DESCRIPTION: HYDRAULIC GIL ********** II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES ********** APPEARANCE: AMBER LIQUID ODOR: MILD VISCOSITY AT 100 F, SUS: 150.0 AT 40 C, CS: 29.6 VISCOSITY AT 210 F, SUS: 45.5 AT 100 C, CS: 6.0 FLASH POINT F(C): >330(166) (ASTM D-92) MELTING POINT F(C): NA POUR POINT F(C): -40(-40) BOILING POINT F(C): > 600(316) RELATIVE DENSITY, 15/4 C: 0.882 SOLUBILITY IN WATER: NEGLIGIBLE' VAPOR PRESSURE-MM HG 200: < .1 NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE. WT PCT EXPOSURE LIMITS PPM (XCREGAX) MG/M3 (SETON GNA) HAZARDOUS INGREDIENTS: NONE OTHER INGREDIENTS: REFINED MINERAL DILS ADDITIVES AND/OR OTHER INGREDS. <10 KEY TO SOURCES: A=ACGIH-TLY, A*=SUGGESTED-TLY, M=MOSIL, O=OSHA NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS. EFFECTS OF OVEREXPOSURE: SLIGHT SKIN IRRITATION. ********* V. EMERGENCY AND FIRST AID PROCEDURES *********** EYE-CONTACT: FLUSH WITH WATER. SKIN CONTACT: WASH CONTACT AREAS WITH SDAP AND WATER. INHALATION: NOT EXPECTED TO BE A PROBLEM. INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER (PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND CALL A PHYSICIAN, HOSPITAL EMERGENCY ROOM OR POISON CONTROL CENTER FOR ASSISTANCE. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH

TO AN UNCONSCIOUS PERSON.

502683-34 PAGE 2 OF 3

MGBIL DTE 13 ********* DATA ****** VI. FIRE AND EXPLOSION HAZARD DATA *********** FLASH POINT F(C): > 330(166) (ASTM D-92) FLAMMABLE LIMITS. LEL: UEL: 7.0 - 6 EXTINGUISHING MEDIA: CARBON DIDXIDE, FOAM, DRY CHEMICAL AND WATER FOG. SPECIAL FIRE FIGHTING PROCEDURES: _FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS. UNUSUAL FIRE AND EXPLOSION HAZARDS: NUME STABILITY (THERMAL, LIGHT, ETC.): STABLE CONDITIONS TO AVOID: EXTREME HEAT INCOMPATIBILITY (MATERIALS TO AVOID): STRONG OXIDIZERS HAZARDOUS DECOMPOSITION PRODUCTS: CARSON MONOXIDE. HAZAROGUS POLYMERIZATION: WILL NOT OCCUR

ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE NUMBER 800-424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT TREATED SAWDUST, DIATOMACEDUS EARTH, ETC. SHOVEL UP AND DISPOSE OF AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT CHARACTERISTICS AT TIME OF DISPOSAL.

WASTE MANAGEMENT: DISPOSE OF WASTE BY SUPERVISED INCINERATION IN COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS.

EYE PROTECTION: NO SPECIAL EQUIPMENT REQUIRED.

SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.

RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.

VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.

******************** X. SPECIAL PRECAUTIONS *************** HANDLING: NO SPECIAL PRECAUTIONS REQUIRED.

******************** XI. TOXICOLOGICAL DATA **************** --- ACUTE---

GRAL TOXICITY (RATS): SLIGHTLY TOXIC(ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

DERMAL TOXICITY (RABBITS): SLIGHTLY TOXIC(ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPGNENTS.

INHALATION TOXICITY (RATS): NOT APPLICABLE --- HARMFUL CONCENTRATIONS OF MISTS AND/OR VAPORS ARE UNLIKELY TO BE ENCOUNTERED THROUGH ANY CUSTOMARY OR REASONABLY FORESEEABLE HANDLING, USE, OR MISUSE OF THIS PRODUCT.

NO CEZAE---EYE IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

SKIN IRRITATION (RASSITS): MAY CAUSE SLIGHT IRRITATION ON PROLONGED OR REPEATED CONTACT. ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

MOBIL DTE 13

502680-04 PAGE 3 OF 3

****************** XII. REGULATORY INFORMATION *****************

TSCA INVENTORY STATUS: ALL COMPONENTS ARE REGISTERED.

EINECS INVENTORY STATUS: ALL COMPONENTS ARE REGISTERED.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS RELOW:

CHEMICAL NAME

CAS NUMBER LIST CITATIONS *** NO INGREDIENT CITATIONS ***

--- KEY TO LIST CITATIONS ---

1 = DSHA, 2 = ACGIH, 3 = IARC, 4 = NTP, 5 = NCI, 6 = EPA CARC, 7 = NFPA 49, 8 = NFPA 325M, 9 = DOT HMT, 10 = CA RTK, 11 = IL RTK, 12 = MA RTK, 13 = MN RTK, 14 = NJ RTK, 15 = NJ SHH, 16 = FL RTK, 17 = PA RTK.

US84-373 APPROVE REVISED: 04/16/35 NEW PRODUCT MSDB

. ***********************************

PREPARED BY: MOBIL OIL CORPORATION

ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ FOR FURTHER INFORMATION, CONTACT:

MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL 3225 GALLOWS ROAD, FAIRFAX, VA 22037 (703) 849-3265

WESTSIDE LANDFILL, INC.

P. O. BOX 350 THREE RIVERS, MICHIGAN 49093

September 7, 1989

Mr. Keith B. Kling Menasha Corporation Environmental Supervisor P. O. Box 155 Otsego, MI 49078-0155

Dear Keith:

Thank you for accompanying me to the two sites you described in your letter of September 1, 1989.

We are considering the new material you will excavate from the area you excavated in March as an extension of our job #1026. It would be a great help to us if this number could be placed on a bill of lading. If you do not use a bill of lading, this number should appear on each individual landfill ticket. You indicate that an HNu meter will be used to detect diesel fuel constituents. I assume that it will be operated by your consultant. This material is approved for disposal.

The material we discussed near your #2 truck dumper is also approved for disposal. We have assigned the number #1109 to it. We understand that you intend to start this project in late September.

We appreciate this opportunity to satisfy your disposal needs.

Sincerely,

WESTSIDE LANDFILL, INC.

Chris Coniglio Admn. Assistant

CC/jm



October 2, 1989

Mr. Keith Kling Menasha Corporation 320 North Farmer Street Otsego, Michigan 49078

RE: Soil Remediation at Previous Fueling Area, Otsego Paperboard Plant

Dear Mr. Klinge:

The purpose of this letter report is to document the soil remediation which was performed in the chipping yard where the truck fueling area previously existed. As you know, contamination from fuel products in the fueling area was identified as part of the contamination survey for the entire site which was performed in August of 1987. This report is prepared pursuant to our proposal of August 30, 1989.

As we have discussed, the probable source of the fuel contaminated soils was over-filling at the fuel pumps. Specifically, the area of remediation was a low area, west of the previous pump location, where surface drainage focused, allowing fuel products to come into contact with surface soil. The remediation area was immediately adjacent to an old fueling building, which was demolished several years ago. Finally the underground storage tank which supplied the pumps was removed in 1987 by Menasha Corporation. This removal was documented by Menasha Corporation and reviewed by representatives of the MDNR.

The remediation began at approximately 9:15 a.m. on the 18th of September, 1989. Menasha Corp. contracted with Cushman Excavating to perform the excavation. Initially, the contractor began excavating in the area where the soil contamination was previously encountered. Excavation radiated out from this point until no contamination was evident visually, olefactorily, or through the use of an HNU meter. The HNU meter, equipped with 10.2 eV lamp, is a portable trace gas analyzer used to scan soils for the presence of volatile organic compounds typically found in fuel products. In general, during this remediation, the presence of volatile organic compounds was noted by HNU readings ranging between 1 and 10 ppm. At the point when contamination was not evident, the excavation was extended one additional foot in all directions. This simple method of over-excavation has, in past experiences, proved successful in final remediation of the excavation.

Figure 1 represents the excavation after it was completed. Based on the dimensions of the excavation, it is estimated that 60 cubic yards (in-place volume) of soil were removed. STS understands that disposal of the soil was performed by the contractor at Three Rivers Landfill in Three Rivers, Michigan.

STS Consultants Ltd. Consulting Engineers

Menasha Corporation Page 2

As stated above, the excavation was carried past the limits of where the HNU meter detected positive for organic compounds. After excavation was complete, soil samples were collected from the walls and base of the excavation for laboratory analysis. Results of the chemical analysis are shown on Table 1, below, with the laboratory data sheets included in the appendix.

Table 1 Summary of Analytical Analysis

		Result (mg/l)	
Sample(s)	Description	BTEX*	TPH**
S-1 - S-5	Walls of Excavation	< 0.01	< 0.01
S-6	Base of Shallow End of Excavation	< 0.01	< 0.01
S-7	Base of Deep End of Excavation	< 0.01	< 0.01

- * Benzene, Toluene, Ethyl Benezene, o,p,m-Xylene
- ** Total Petroleum Hydrocarbons

As can be seen from the table, the analytical results of the soil samples show no detection above 10 ppb.

Based on the visual observations, results of HNU meter scan in the field, and the on-set of laboratory analysis, as presented in this report, it would appear that excavation of the contaminated soil has left no soil with contamination above current laboratory detection limits. STS does not recommend further remediation in this area other than the currently-planned capping of the immediate vicinity with asphalt paving to mitigate surface infiltration.

STS has enjoyed the opportunity to again work with the staff of Menasha Corporation on this project. If you have any questions regarding this letter or require additional information, please feel free to contact me.

Sincerely,

STS CONSULTANTS, LTD.

Bernard B. Sheff, P.E. Senior Project Engineer

Area Manager

BBS/lch Attachments BBS23 #30

Anne M. Murray

Hydrogeologist

SODIUM SILICATE MSDS

DOCUMENT #4

MSDS: 1696 Revised: 6/26/91 scatus: Pending Formula: NOT GIVEN Part Number: NOT GIVEN Specification: NOT GIVEN Keyword: NOT GIVEN Synonyms: NOT GIVEN Stock Items: NOT GIVEN Manufacturer PQ CORP. 11 EXECUTIVE MALL PO BOX 840 Phone: VALLEY FORGE, PA 19482 Emergency: 215-293-7200 Supplier PQ CORP. 11 EXECUTIVE MALL PO BOX 840 Phone: VALLEY FORGE, PA 19482 Emergency: 215-293-7200 Physical/Chemical Characteristics Boiling Point NA
Melting Point NG
Freezing Point NG NOT APPLICABLE. Pour Point NG Softening Point: NG Specific Gravity: BT
Vapor Pressure: NA
Vapor Density: NA
Percent Volatiles ...: NG 1.3 1.5 LIOUIDS ONLY. NOT APPLICABLE. NOT APPLICABLE. Evaporation Rate: NA NOT APPLICABLE. рН -.... ВТ 13 11 AQUEOUS LIQUIDS ONLY Molecular Weight: NG Viscosity NG Solubility in Water ..: COMPLETE.
Odor/Appearance/Other Characteristics:
NO ODOR/VISCOUS LIQUID, COLORLESS TO HAZY. Fire and Explosion Data Closed Cup Flash Pt. .: NA Open Cup Flash Point .: NA NOT APPLICABLE. NOT APPLICABLE. Fire Point NG Auto Ignition NG Lower Explosion Limit: NA NOT APPLICABLE. Upper Explosion Limit : NA NOT APPLICABLE.

Shipping Regulations UN/NA Number: NG

DOT Hazard Class: NOT APPLICABLE Shipping Label: NOT GIVEN Shipping Name: NOT APPLICABLE

Material Safety Data Sheet MSDS: 1696
'DS: 1696 - SODIUM SILICATE

Prepared

Preparer's Name & Title: JOHN G. BLUMBERG, PRODUCT SAFETY COORDINATOR

Preparation Date: 11/11/85

Component(s):

SODIUM SILICATE

OSHA Pel: NE ppm
ACGIH TLV: NE ppm
STEL: NG ppm
Percent of Product: N

Percent of Product: NG CAS No.: 1344098

Note: * TLV: NOT ESTABLISHED.

Text Section(s)

IDENTIFICATION OF PRODUCT

SEE DATA PAGES FOR ADDITIONAL INFORMATION.

SALES NAME: O(R) sodium silicate solution.

CHEMICAL NAME: Silicic acid, sodium salt*.

EMERGENCY TELEPHONE NUMBER: (215) 293-7200.

TSCA CAS REGISTRY NO.: 1344-09-8.

DOT HAZARD CLASS: N.A.

DOT SHIPPING NAME: N.A.

DOCUMENT 0297A.

REPLACES SS-3L.

CAUTIONARY CODE: 91L.

PHYSICAL DATA

SEE DATA PAGES FOR ADDITIONAL INFORMATION.

MSDS: 1696

SOLIDS CONTENT (SOLUTIONS DISPERSIONS, OR PASTES ONLY): Within a range of 30-53% by wt.

FIRE AND EXPLOSION HAZARD DATA

SEE DATA PAGES FOR ADDITIONAL INFORMATION.

FIRE EXTINGUISHING MEDIA: N.A.

SPECIAL FIRE FIGHTING PROCEDURES: N.A.

UNUSUAL FIRE AND EXPLOSION HAZARDS: N.A.

REACTIVITY DATA

STABILITY: Stable.

Flammable hydrogen gas may be produced on prolonged CONDITIONS TO AVOID: contact with metals such as aluminum, tin, lead, and zinc.

INCOMPATIBILITY (MATERIALS TO AVOID): Gels when mixed with acid.

HAZARDOUS DECOMPOSITION PRODUCTS: Hydrogen.

SPILL OR LEAK PROCEDURES

ENVIRONMENTAL HAZARD: High pH (alkalinity) of undiluted or unneutralized material is harmful to aquatic life.

SPILLAGE: Sinks and mixes with water.

SMALL QUANTITIES (LESS THAN 100 GAL.): Mop up and flush to sewer with plenty of water.

LARGE QUANTITIES: Isolate, dike and store discharged material, if possible. Otherwise disperse and flush with water. Observe environmental protection regulations.

WASTE DISPOSAL METHOD:

SMALL QUANTITIES (LESS THAN 100 GAL.): Flush to sewer with plenty of water.

LARGE QUANTITIES: Neutralize with dilute acid and landfill solids according to local, state, and federal regulations. Flush neutral liquid to sewer with plenty of water.

HEALTH HAZARD DATA

EYE CONTACT: Causes irritation.

SKIN CONTACT: Causes irritation.

INHALATION: Causes irritation.

INGESTION: Causes irritation.

CHRONIC HAZARD: No known chronic hazards.

FIRST AID PROCEDURES: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician. Flush skin with water. If swallowed, do NOT induce vomiting. Give large quantities of water or milk. Call a physician.

SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Use NIOSH approved mist respirator where spray occurs.

GLOVES: Rubber where contact likely.

EYE PROTECTION: Chemical goggles and/or face shield.

OTHER PROTECTIVE EQUIPMENT: Safety shower and eyewash fountain should be within direct access.

PERSONAL HYGIENE: Avoid contact with eyes, skin, and clothing. Wash thoroughly after handling. Wash contaminated clothing before re-use.

MSDS: 1696

ENGINEERING CONTROL: N.A.

SUBSTANCES FOR WHICH STANDARDS HAVE BEEN SET

OSHA Permissible Exposure Limit or ACGIH Threshold Limit Value have not been established. PQ recommended Ceiling limit 5mg/m3.

EXPOSURE ANALYSIS METHODS: Bubble sample through standardized acid solution and titrate.

SPECIAL NOTES

N.A. = Not Applicable.

*Includes other hazard classes, to which different safety data sheets apply.

End of MSDS

MATERIAL SAFETY DATA SHEET

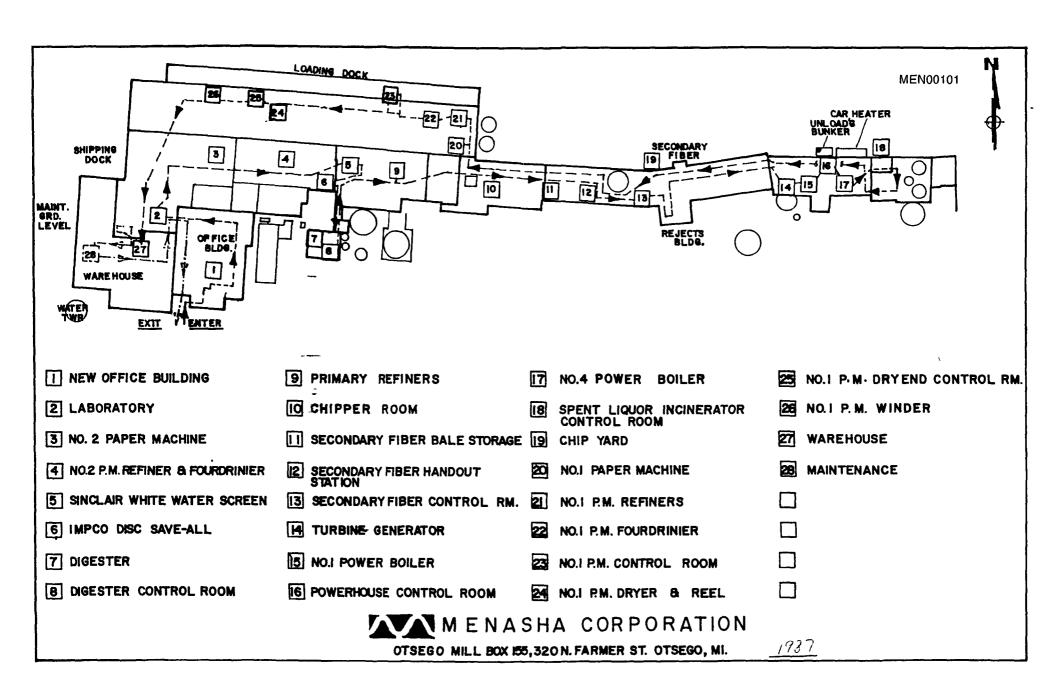
		SECT	าอกา						
Monufacturer's Name Philadelphia Quartz Company 215-14/-7200									
Address (Number, Street, City, State, A. a. /). Public I Chemical Name and Synonyms Sodium S	ede	er Bi	ilding - T	ndenend	ence Sa	7118	re		
Chemical Name and Synonyms Sodium S	iili	cate	Trade No	ine and Synon	ymsSS-C	Pw	d.		
Chemical Family Alkali Silicat		, .	Formulo NagO.						
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Pigments				·	·	ļ			
Cotalyst			Alloys			<u> </u>			
Vehicle	<u> </u>		Metallic Coatings		 				
Solvents	11		Filler Metal Plus Coating or Core	c.Flux					
Additives			Others			<u> </u>			
Others									
HAZARDOUS MIXTURES	OFOT	HER LIQ	ÙIDS, SOLIDS, OR G	4525		ح.	TLV (Units)		
Contains 32.70% NagO), 6	5.40%	% SiO ₂						
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Vapor Pressure (mm Hg.)	1		Percent Volatile By Volume (5)	N.A.		T			
Vapor Density (Air= 1).			Evaporation Rate	N.A.		1			
Solubility in Water Soluble in al	1 5					1			
Appearance and Odowhite odorles									
7/1120 7/102103	<u> </u>	<u> </u>							
SECTION IV FIRE AND EXPLOSION HAZARD DATA									
Flash Point (Method Used) None			Flammable Luni	Vone	Lel		Uel		
Extinguishing Media	ire	d	·	····	 		······································		
None required Special Fire Fighting Procedures None	<u></u>	. 							
none			··						
Unusual Fire and Explosion reasons and a second sec									
Unusual Fire and Explosion Marerial is not explosive and not flammable.									

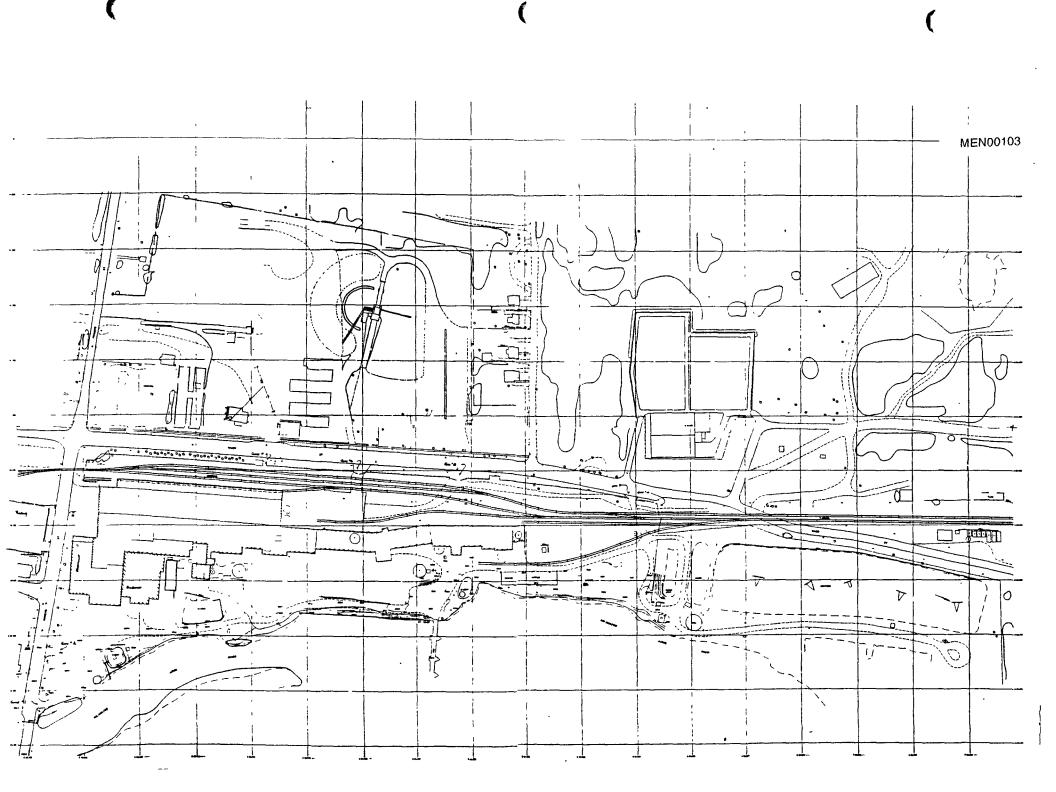
Pkg. Dim. (OD): Gross Wgt.:

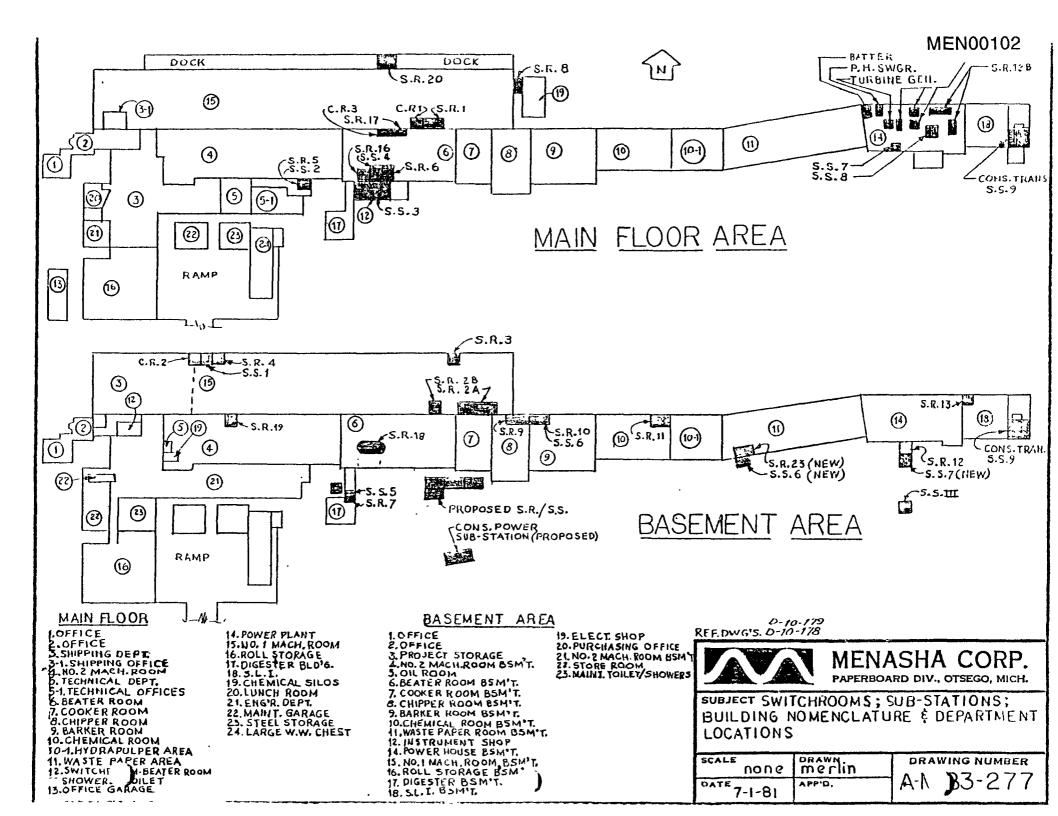
	•								
SECTION V HEALTH HAZARD DATA									
Threshold Limit Value N.A.									
Effects of Overexp	osure Irritat:	ion to	skin	and eyes					
						· · · · · · · · · · · · · · · · · · ·			
Emergency and Fir	st Aid Procedures F	<u>lush</u> i	mmed.	for 15 mi	n. with	water;	for eyes		
flush wit	h water for	r 15 m	nin. ar	id call a	physici	an.			
[· ·							****		
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<u></u>	•			·			.,		
	SECTION	VIII SPE	CIAL PR	OTECTION IN	FORMATIO	N	,		
Respiratory Protec	tion (Specify type)								
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	Mechanical (Genera				Other				
Protective Gloves Yes Eye Protection Yes									
Other Protective E	quipment No	one '							
				PRECAUTION	·				
Precontions to be Token in Hondling and Staring Do not store in high heat and humidity									
	to prevent	cakin	ng.						
Other Precautions									

MILL LINE DRAWINGS COVERING 1954-1990

DOCUMENT #5

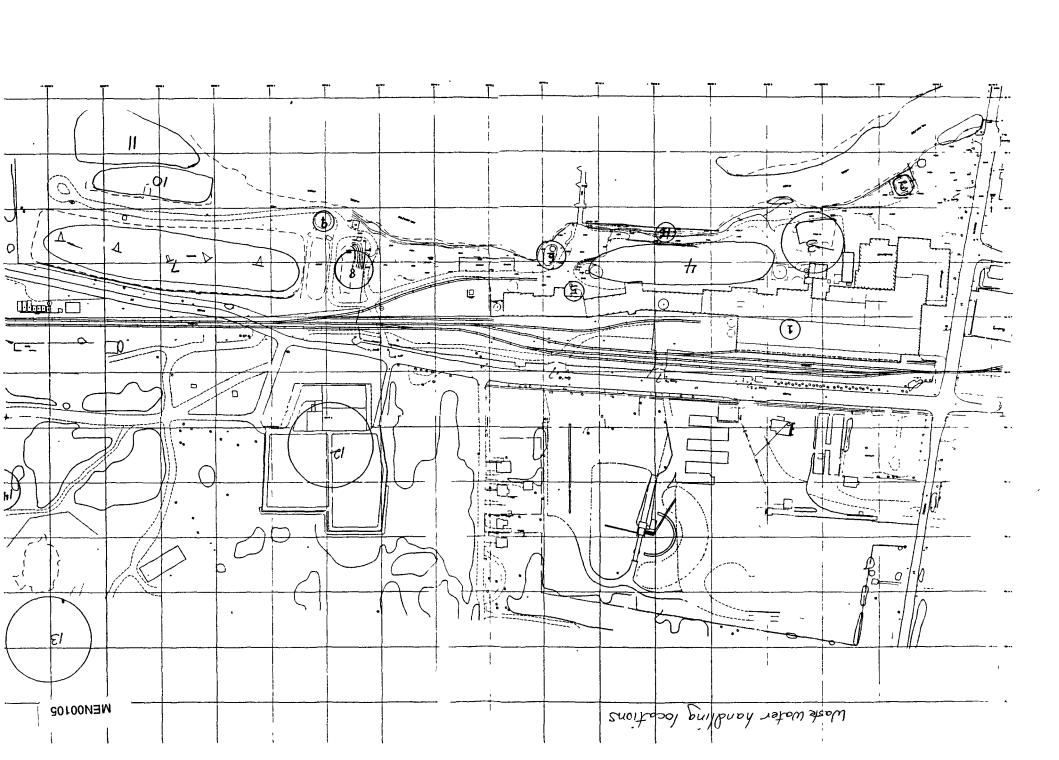






MILL DIAGRAM IDENTIFYING PHYSICAL WASTEWATER LOCATIONS

DOCUMENT #6



f

LIQUOR POND CLOSURE

DOCUMENT #7



PAPERBOARD DIVISION

MENASHA CORPORATION

TO:

John Bonham

FROM:

Keith Kling KBK

DATE:

April 27, 1994

SUBJECT:

Liquor Pond Closure

In response to Solar Turbines questions concerning the proposed location of the cogeneration building, I have completed the following research.

From the 1940's until 1982, spent cooking liquor was stored in an unlined pond south of the mill in the area now proposed for the cogeneration project. In 1982 Menasha Corporation built two tanks and a lined lagoon to hold spent liquor. This project was completed to improve mill operations and to ensure our environmental responsibility. Michigan Department of Natural Resources (MDNR) was pleased with this direction but had not required the project.

Following successful tankfarm operation, a closure plan for this and one other pond was developed and submitted to Corporate office. A copy of the summary report is attached as Document #1.

Following funding approval, a comprehensive cleanup plan was developed and was reviewed with MDNR on Feb. 23, 1983. A copy of the meeting minutes is attached as Document #2.

MDNR requested several tests be run as shown in a letter by Garth Aslakson. This is attached as Document #3. The results of the testing are shown in Document #4. Following review of the test data, MDNR gave approval of this project. This is attached as Document #5.

The testing clearly indicated the non-hazardous nature of this material. As of this date, our company still receives referrals from MDNR during the summer for use of liquor as a dust control agent. I discussed the details of this project with Fred Morley of MDNR on April 19, 1994. He indicated that due to the voluntary nature of the closure, the non-hazardous nature of the substance and the lack of indication of leaching from the pond, MDNR did not require a formal closure document.

KBK/alp

DOCUMENT

#1

NATURE OF EXISTING FACILITIES

Since December of 1982 the liquor and sludge storage tank farm has been storing both weak and intermediate liquor. With the installation of the tank farm, the unlined liquor ponds are no longer required to store weak liquor.

Spent liquor still remains in the two ponds. The "main pond" is located south of the mill in an old millrace channel. The "back pond" is located at the east end of the property between the waste treatment plant basin and the Kalamazoo River. Both ponds contain sludge deposits consisting of a combination of fiber and liquor precipitates. Estimated volumes of liquor and sludge remaining are given below:

	Main Pond	Back Pond		
Liquor Volume	1,849,000 gal.	2,692,000 gal.		
Heavy Sludge Volume	1,278 cy	2,963 cy		

WHERE INADEQUATE

In Michigan, all discharges of materials to the ground waters are regulated by the Part II Ground Water Quality Rules of Act 245. Rule 2206 states that "Discharges into ground waters of the State are regulated by permits issued in accordance with sections 7 (1) and 8 (b) of the Act." Rule 2205, paragraph I, states that "The quality of ground waters and all useable aquifers shall not be degraded from local background ground water quality as result of à discharge except as provided in Rule 2210". Paragraph III states that no materials that have concentrations of contaminants higher than the National Primary Drinking Water Quality Standards can be discharged to the ground waters even if the background concentrations of these materials already exceed the drinking water standards. We do not have a ground water discharge permit for any seepage or diffusion that may occur from any of these ponds.

Because there are no barriers to prevent a ground water discharge, the MDNR maintains that it must be assumed there is a ground water discharge taking place. Therefore, a ground water discharge permit is required for these ponds. However, if any of the material from either of these types of ponds is being discharged to the ground water, it would degrade the ground water quality above background levels and the contaminant concentration would be greater than drinking water quality standards, thus violating both paragraphs I and III of Rule 2205. Therefore, no ground water discharge permit could be issued for these ponds. The only way we could continue to use the existing liquor storage ponds would be to prove that there is no discharge from them to the ground water. If this is indeed the case, it could cost us a great deal of money and still be impossible to prove because ground water in the area

is already slightly contaminated from an incident in 1973 with the same materials that would be seeping from the liquor storage ponds. As long as these unlined ponds are in use, we have an environmental liability that could amount to several million dollars if we are required to correct a ground water contamination problem.

PROPOSED REMEDY

To achieve the most cost-effective closure, a two-year plan will be implemented. The first year will be spent on closing the main pond, and the second year will be spent on closing the back pond. A small section of the main pond has been isolated and designated as a mixing pond. Liquor from the main pond will be pumped into the mixing pond where it will be diluted with liquor from the weak liquor tank. This is necessary to create an acceptable consistency for the liquor to be applied as roadbinder. Due to the heaviness of the pond liquor, it is expected that the average dilution ratio for acceptable roadbinder will be three parts weak liquor to one part pond liquor.

After agitation in the mixing pond, the liquor will be pumped through a screening system consisting of a selectifier screen and a Jonsson screen. The rejects from the Jonsson screen, mostly plastics, will be temporarily stockpiled at the back The accepts from the system will be pumped to the existing liquor loading station at the east end of the mill. The liquor will be hauled out in tank trucks and applied to dirt This hauling and gravel roads in eight surrounding townships. will continue for as long as possible from the main pond. the bottom of the pond is reached, and the liquor becomes a heavy sludge, it will be necessary to mix this to an acceptable consistency with oversized wood chips and fines, and to haul the sludge to the class II landfill at Watervliet. It is estimated that the bottom two feet of both ponds will have to be disposed of in this way. Note that this is only an estimate as there is no way to accurately assess sludge depth at this time.

After the main pond has been emptied of liquor and sludge, it will be charged with a sand and gravel mix and compacted to provide an acceptable soil for future construction. The mixing pond will be left open until the back pond is closed.

It is expected to take the entire first summer to close the main pond. The second summer will be spent on closing the back pond in a similar fashion to the main pond. Not as much fill will need to be hauled in as the existing dikes can be pushed in once the pond is empty.

After both ponds are closed, the existing pump stations, screening station and old bridge will be demolished. In addition, the weak liquor tank will be enclosed by a dike which is capable of holding 1.5 times the tank volume in accordance with the MDNR requirements.

A sump with a pump will be required inside the dike. The pump will be one of the existing liquor pumps which is no longer required.

It should be noted that an excessively wet summer will severely hinder our roadbinder program. If this happens, we will either have to incur additional expense in order to stay on schedule, or delay the project time line, whichever is most appropriate.

PROJECT IMPACT ON MILL STRATEGIC PLAN

The largest single area to the south side of the mill is the main liquor pond. Any expansion related to the secondary fiber operation would logically be to the south of the mill. A reject handling building and additional bale storage building are proposed for the site. Construction of the reject handling building will need to be complete by the end of July 1984.

FINANCIAL AND INTANGIBLE BENEFITS

This project is essential to maintain operations and comply with the MDNR requirements. Failure to comply with the MDNR environmental requirements would result in adverse consequences. Additionally, this project upholds Menasha's civic responsibility to insure a clean environment exists for the community.

DOCUMENT

#2

MINUTES OF MEETING

DATE:

Pebruary 21, 1983

DATE SUBMITTED!

Pebruary 25, 1983

THOSE PRESENT:

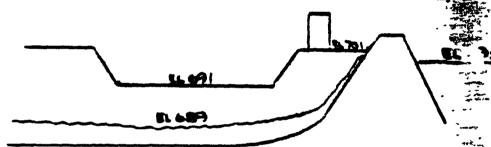
Menasha: David Rao, Bruce Buchanan, John Blaumarp, Herb Smiley, Jerry Devisser-

DWR: Fred Morely, Garth Aslanson, Marge Spruit

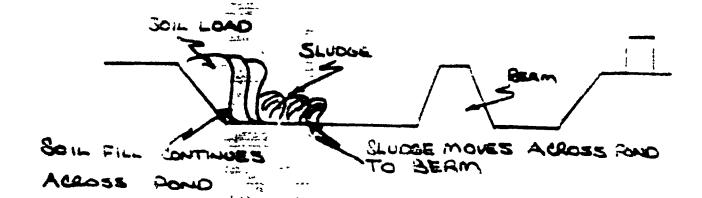
SUBJECT:

Liquor Pond Closure

 Menasna presented the proposed plan of closure for the liquor pends to the DMR people. David Rao showed are cross section (east-west) of the pend and its relationship to the damn and river.



- 2. The emphasis in liquor removal will go to the roadbinder program. Memasha's plans are to remove the majority of liquor under this concept. The DNR people reacted. [am vorably to this proposal.
- The DNR people conceeded that the vacuum cleaner approach would be cost-prohibitive.
- 4. Menasha presented a method to remove the liquor and sludge. The process would begin by placing a berm across the pond, agitating the pond with the manure pump and then pumping as much as possible over to the pond side of the berm. We would add a soil load on one end, forcing the sludge to the berm and then removing it with a dredge.



- 5. An alternate method would be to drag the entire pond, removing sludge and soil.
- 6. No decision could be hade as we could not determine how clean the area must be upon completion.
- 7. We will meet again on March 23, 1983 at 10:00 A.M.. At that meeting Monasha will provide:

The DNR walls.

Check our roadbinder authorization.
Review procedure for closure.

さつり HS/MM **DOCUMENT**

#3

STATE OF MICHGAN



Statement Comments Commented to the Comment of the

ACCES A HORFIGE 1 TO LAPALA HOLE IN HORFILE HOLE IN HORFILES

JAMES J SLANCHARD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

HOWARD & TARRES Droser

March 2, 1963

Mr. John Slausano Monacha Corporation P.O. Box 155 Otoego, Michigan 49078

Deer Mr. Blaumann:

At our meeting last week we discussed the closure of Menaska's spent liquor lagoon. One of the closure options considered was burish of the lagoon sediments at the present location. On-eite burish would require that Section-6 of Act 265 be satisfied. Section-6 states that setivities which "are or may become injurious to the waters of the state" are unlawful.

You requested guidance as to what chemical analysis would be required before the Department of Natural Resources would consider on-sits burial of the sediment from the spent liquor lagoon. Measake should perform an EP toxicity test, an analysis for PCB, den analysis for sulfits of the sediment pertion of the spent liquor lagoon. After examination of these test results, the Department will advise whether or not we would authorize on-site burial of the lagoon sediments.

If you have any questions, please call me at (517) 373-3710.

Sincerely,

gate audin

Gerth Aslakson Water Quality Specialist Surface Water Quality Division

cc: F. 3lakesiee/SWQD File

1. Marks

X. Spruit

Specific Metals Analysis
Should include:

L Cadmina

z. Chrome

3. Morcery

a. Lond.

2-1-33 3-4**DOCUMENT**

#4

PERPOSE

The purpose of this study is to evaluate the study from Monasha Corporation. Steepo. Michigan, to determine the nature of the leacnable constituents for wests disposal. This evaluation will define the possible wasts classification in accordance with the criteria set forth in the May 19, 1980, Federal Register. Volume 45, Rumber 98, 40 CFR Part 261.24, Characteristics of EP Toxicity, Appendix II to that subpart, and the Michigan Department of Natural Resources (DNR) Act No. 64 of the Public Acts of 1979.

METHOD AND PARAMETER LIST SECTION

The method selected was the EP Toxicity Study using the Michigan DNR parameters listed in Act No. 64.

The method and parameter list were provided to Western Michigan Environmental Services, Inc. (ESI) through discussions with

John Blauwkamp of Menasha Corporation and William Bouma of ESI.

Chromium

Copper

Lesd

Mercury

Mickel

Selenium Silver Zinc ASTM Nathod 1...37 and Standarn Methods Part 124

ASTM Hethod 38 and Standard Methods Fart 3A

ASTM Method 03559 and Standard Methods Park 3154

Cold Vapor Frocadure, ZPA Mathod 7470

ASTM Method D188' and Standard Methods Part 321A

EPA Method 7740

. ...

Standard Methods Part 324A

ASTH Method D1691 and Standard Methods Pert 328A

PROCEDURE

The L-sludge leachars was prepared for analysis by the mrocedure of the Environmental Protection Agency (EPA) That Jathous for Evaluating Solid Masta, Jacond Edition, Physical/Chemical Methods, July, 1982, EP Toxicity Past.

The equipment utilized was an ESI EP Toxicity 5 solid waste rotary extractor operating at 19 rpm for twenty-four (24) hours as specified by the procedure. The sample and deionized water were placed into a one (1) gallon (4 liter) glass container and put into the rotary extraction apparatus.

The solid was prepared for extraction. During the extraction period, 0.5% Acetic Acid was added to adjust the pH to 5.0 ± 0.2 . After the extraction period, the final volume was adjusted to twenty (20) times the original sample weight with deionized water. The solid was then separated from the liquid phase by filtration through a 0.45 um filter. The resulting filtrate was then analyzed for the parameters listed on the Table of Results.

The analytical procedures and/or instruments utilized were as follows:

Solids, all forms

Cyanide

Metals, general

Arsenic Berium

Cadmium

ASTM Method 1888 and Standard Methods Part 208.

EPA Method 9010

ASTM Method D2576 and Standard Methods Part 203 A utilizing an Atomic Absorption Spectrophotometer* (dual beam with D2 background correction)

EPA Method 7060

EPA Method 7081

ASTM Method D3557 and Standard Methods Part 310A

*Atomic Absorption Spectrophotometer Jerrell Ash Model 850 Perkin Elmer Model 403 Perkin Elmer Model 5000 with a HGA 500

<u>.</u>...

DESCRIPTION

The L-sludge consisted of shredded pieces of plastic, paper, leaves, and root-like material, all covered with a brown, oily substance. The sample had a very pungent septic smell.

Two hundred and twenty-nine (229) milliliters of 0.5% Acetic. Acid were added to adjust the pH from 9.9 to 5.2 pH units.

The original sample contained 62.13% total solids, of which 86.0% were volatile and 14.0% were ash.

ER TOXICITY - TABLE OF CICCION

Leachais Concentration

of

L-61udge

TO B

Menasha Corporation March 11, 1983

All results expressed as milligrams per liter (mg/l)

PARAMETER		MAXIMUM C	CONCENTRAT:	
		EPA	DNR	
Arsenic	<0.01	5.0	5.0	
Barium	0.08	100.0	100.0	
Cadmium	0.02	1.0	1.0	
Chronium	0.10	5.0	5.0	
Copper	0.07	• • •	100 .0	
Cyanide	<0.02	6 · · · · · · ·	20.0	
Load	0.16	5.0	5.0	
Mercury	0.001	. 0.2	0.2	
Rickel	0.05	20.0		
Selenium	<0.01	1.0	1.0	
Silver	<0.005	5.0	5.0	
Zine	1.2	***	500 .0	

Original Sample:

Total Solids 62.13 % of sample Volatile Solids 53.42 % of sample 8.71 % of sample

EST #830247

Liquir sludge dipper from pend. Eventually used as road binder KBK 4/27/94 Serial Design Check The Line Edward Check The Line Check The Line

CONCLUSION

The concentrations of the parameters evaluated have fallen well below the maximum concentration levels set by EPA and ESE for the EP Toxicity Test. Therefore, this report should be submitted to the Michigan Department of Matural Resources, for approval of this weste material classified as non-bazardous.

THE STATE OF MEANING THE PARTY SECTION AND A STATE OF THE PARTY OF THE

PURFOSZ

The numbers of this study is to evaluate the liquot pond sludge composite true densers Corporation, Stage, dienigen, to determine the nature of the reschable constituents for weste disposal. This evaluation will define the possible weste classification in accordance with the critaria set forth in the May 13, 1980, Foderal Legister, folume 45, America 48, 40 STR Part 151.14, Therefore to TF Torioisy, appendix all to that support, and the Michigan Department of Matural Resources (DER), Act No. 54, of the Public Acts of 1979.

METHOD AND PARAMETER LIST SECTION

The method selected was the EP Toxicity Study using the Michigan DNR parameters listed in Act Eo. 64. Also requested for analysis was PCS (polycolorinated biphenyls) and sulfite.

The method and parameter list were provided to Western Michigan Environmental Services, Inc. (ESI) by Dave Schweizer, of Menasha Corporation.

THE MICHAEL CONTROL NO.

PECALDER!

The liquor pond stance composite learners was remared foranalysis by the procedure of the Environmental Protection Agency (EFA) Test Methods For Avaluating Solid Mesto, Second Sditton, Physical/Chemical Marnoca. July, 1982, AP Toxicity Past.

The equipment utilized was an ESI HP Toxicity o solid waste rotary extractor operating at 29 rpm for twenty-four (24) hours as specified by the procedure. The solid portion of the sample and defonized water were placed into a one (1) gailon (4 liter) glass container.

The original solid and liquid portions were separated. The original liquid was refrigerated at 4°C to be combined with the final leachate filtrate and analyzed. The solid was prepared forentraction. During the extraction period 0.5% Acetic Acid wasadded to adjust the pH to 5.0 + 0.2. After the extraction period the final volume was adjusted to twenty (20) times the original sample weight with descrized water. The solid was then separated from the liquid phase by filtration through a 0.45 um filter. The resulting filtrate was then analyzed for the parameters listed. on the Table of Results.

The analytical procedures and/or instruments utilized werees follows:

Solids, all forms

Cyenide

Stilfita

Metals, general

ASTM Method 1888 and Standard Methods. Part 208.

EFA Method 9010.

ASTM Method_D3534 Utilizing Tracor-560 GC with Mi®3 electron capture detector.

Standard Methods Part 428.

ASIM Method D2576 and Standard Methods Part 203 A utilizing an Atomic Absorption Spectrophotometer* (dual beams with D, beekground correction.

EPA Method. 7060...

`_ ^ _ _ _ _

*Atomic.Absorption Spectrophotometer-Jerreil Ach Hodel 836 WESTERN LICE STANK SERVICES INC.

DESCRIPTION

The liquor pond sludge composite was a sark brown liquid sludge. The sample was separated into the solid and liquid portions using centrifugation and vacuum filtration through 0.45 gm memorane filters. The sample was extremely difficult to separate.

A 64.1 solid sample was finally separated. The liquid was placed in the refrigerator. 124.2 ml of 0.53 Acetic Acid were added to adjust the pH from 9.0 to 5.0. After extraction, the leachate was again separated using centrifugation, then vacuum filtration through 0.45 am membrane filters.

The original sample contained 27.26% total solids, of which 39.25% were volatile and 60.75% were ash. The sample also contained <0.05 mg/kg PCB and 362 mg/kg sulfite.

TP "DRICKT" - TABLE OF EXSULTS

Lescoste Concentration

of

Liquor Fond Sludge Composite

(March 3, 1983)

Memasha Corporation

Otsego, Michigan

Merch 24, 1983

all results expressed as milligrams per liter (mg/l).

PARAMETER		MAXIMUM CONCENTRA	TION
• •			R
Arsenic	<0.003	5.0	Ò
Serium	0:02	100.0	0
Cadmium	0.01	1.0	0
Chronium	0.04	5.0	0
Copper	0.01	42100.	0
Cyanide	a	10.	0
Load	0.06	5.0	0
Hercury	<0.001	0.2	2
Mickel	6.10	20.0	•
Selenium	<0.002	1.0	.0
Silver	<0.005	5.0	Q .
Zine	0.93	500	0:

Original Sample:

Total Solida 27.26 % of Sample Volatile Solids 10.70 % of Sample 16.56 % of Sample

EST #830323

Sludge off bottom of pond. Eventually mixed with tractor mounted pump and taken out as road binder KBK -4/27/9

THE PERSON OF TH

SOLUTION OF



HYDRO RESEARCH SERVICES Water Management Division Clow Corporation

408 Auburn Avenue Poritiac, MI 48058

313 334-1630 313 334-4747

4-15-83 ow well end

MEN00129

Menasha Corporation 320 North Farmer Street Otsego, MI 49078 Att: Mr. Roys

Sample received: 3-10-83

Hydro Number: 62354

OW 1 Client I.D.

16-17.5

OW 1 22-23.5

62355

OW 2 24.5-26

62356

Total Solids,

86.2

84.8

84.0

Total Volatile Solids,

(2.5) 2.1

(2.0) 1.7

(1.7) 1.4

Ash %

(97.5)84.1

(98.0)83.1

(98.3) 82.6

Results in parentheses are calculated on a dried wt. basis.

from well ar pond,

from Liguer pond,

near

core samples of soils
below liquor pond in
area proposed for
cogeneration facility.
Samples requested by MDNk
as part of closure plan.

KBK - 4/27/94

General Laboratory Manager



HYDRO RESEARCH SERVICES
Water Management Division
Clow Corporation

408 Auburn Avenue Poritiac, MI 48058

4-15-83

313 334-1630 313 334-4747

MEN00130

Menasha Corporation 320 North Farmer Street Otsego, MI 49078 Attn: Mr. Gary Roys

Sample received: 3-10-83

Hydro Number: 62354

Client I.D. OW 1

 Phenol, mg/kg
 3.6

 Sodium, Na, mg/kg
 190

 Calcium, Ca, mg/kg
 1400

 Sulfate, SOh, mg/l
 160

 Magnesium, Mg, mg/l
 83

Carbonate, CO₃, mg/l A trace amount of carbonate (less than 1%) was detected

Iron, Fe, mg/l

A qualitative check for iron
using hydrochloric acid did not
indicate the presence of iron in

any appreciable quantities.

Test results are from core sample at west end of pond at 16-17.5 ft depth.

KBK-4/27/94

Linda Deans

General Laboratory Manager

)tsego	derasua.
10101	Contraction.

Samples taken march 1, 1983 Amalytical Casults

1	·		ivi 4		P. C.	為			n la			tea	14	遊出	· · · · · · · · · · · · · · · · · · ·	· .
				Ash (X)	Molatile Solids (3)	Total Solids (X)	Sodium	Salfur, total	Sulfate	Mesols	T.O.C.	C.O.D.	Chlorides	Alkalinity (as CaCC ₃)	forame ter	
77	pond,	Core Sample.	*	83.42	1.30	84.72	230	720	1,900	6.1	350	3,500	ŝ	2,520	2011 Cample 0.W. #1 mg/kg	samples taken march
KBK 4/27/94	South edge		\rightarrow	81.52	0.94	82.46	100	\$	2,600	a. 1	35	5.00	ź	1,670	Sail Sumie 0.8. /2 2/kg	1, 1983
4		e. Liquid liquor	->	2.90	2.90	5.80	5,750	æ	1,200	SS.2	10,600	30,300	250	19,700	Liquor Sample	

31 1 2 And St. of Marmons, 374 (2) (2008-2772) 3 (2017-2772)



BPORT NUMBER

October 9, 1984

Memesha Cerporation P.U. Sex 155 Otosgo, NI 49078 -ATTHE Koith D. Kline

DATE REC'D - 9-24-44

Soil samples from button at pond prior to filling KBK - 4/27/94

MANUAL IBENTIFICATION:	teachete of #1 Liquer	Leachete of #2 Liquor	toecheto o
MALTEISI			
Arcenic (ag/1)	< 0.01	< 0.01	< 0.J1
	3.74	0.58	1.43
Todaico (mg/1)	0.020	0.020	0.045
#### Chronium (mg/1)	9.03	0.04	0.15
Lood (ag/1)	0.03	0.02	0.07
Lood (ag/1) Rescury (ag/1)	0.0077	0.0042	0.0042
Belenius (eg/l)	0.001	0.001	0.001
-811ver (og/1)	0.02	0.02	9.05
-			

MOTE: Organics will follow on sessing report. Banales were analyzed by methods in SU-646, lest dethods for Evaluating Solid Waste, 1982.

A & L ENVIRONMENTAL SERVICES

Seran Christian Chooses

OC/Cad

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DOCUMENT

#5

MEN00134

May 17, 1983

Mr. Herb Smiley
ManasharCorporation
Box 155
Otsego, Michigan 49078

Dear Mr. Smiley:

I have received and reviewed your proposal for closure of Menasha's spent liquor lagoons. The report was well prepared and presented adequate detail and information for evaluation. Based on the contents of Menasha's proposal, approval to proceed with the project is given. However, I want to caution you on one aspect of the project. The back pond is quite close to the Kalamazoo River. Special care should be taken during the closure of this pond to prevent breaching of the pond side wall between the pond and the river.

Please contact me at (517) 373-3710 if I can be of further assistance.

Sincerely,

Garth Aslakson Water Quality Specialist Surface Water Quality Division

ينصه

cc: Paul Blakeslee/SWOD File
Fred Morley/District File)
Galen Kilmer

PAPERBOARD DIVISION

MAN MENASHA CORPORATION

Otsego Mill P.O. Box 155 Otsego, MI 49078-0155 (616) 692-6141 FAX (616) 692-2060

PURCHASE ORL... MEN00135

THIS NUMBER MUST APPEAR
ON ALL PACKING LISTS AND INVOICES

S

P.O. NO.

P.O. DATE P.O. PAGE 511.005 07/22/94

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W1 49434 9261

PARKURGARO BIVISTOR MENASSA CORROLATION 320 HOCTE FARMER ST

- 任警会兼任司

州上市中央18

SHIP TO CODE 00

BEST WAY

FOB OUR PLANT

SALES TAX YES

ACCOUNT NUMBER 166-186-90:

B PAPERBOARD DIVISION

L MENASEA CORPORATION

FO BOX 155

TO TSEGO

NI 490 4

CONFIRM SE

NUMBER QUANTITY ITEM NUMBER DUE DATE PRICE TOTAL DESCRIPTION OAR SOIL SAMPLE PROMETTE 08/05/94 500.000 500,00 LIQUOR POND CLOSURE SITE TO DE TESTED FOR BAZARDOUS WASTE DETERMINATION BY TCLP BXCLUDING PRSTICIDES AND HERBICIDES TESTS.

*For compliance with the OSHA standard on Hazard Communication, this purchase order requires that the vendor supply Material Safety Data Sheet(s) (MSDS) and warning labels on each and every different material listed. The *MSDS* is to be furnished with the order acknowledgement, the shipping papers and with the invoice. Any order not in compliance with this request is subject to rejection and/or delayed payment until the MSDS is received."

SPECIAL INSTRU	IBS U.C.C. (VACVORS. 50) MERCIAL CODE OF ANTES	PAGE TO		1984 00
	APPLIES TO THIS PURSON ORDER.	TAX	%	
	TO BE USED FOR	P.O. TO	TAL	580 00
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HH()()	IISITIONED RY	AUTHORIZATION		

AERATION POND DESIGN

DOCUMENT #8

WHITE WATER TREATMENT PLANT

LAGOON SPECIFICATIONS

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WHITE WATER TREATMENT PLANT

INDEX

Design Data Table 1 B.O.D. Reduction Chart and Table 2 Horse Power Requirements Nutrient Feed System Table 3 Lagoon Specifications Appendix I Aerators Specifications Appendix II Appendix III Lagoon Details Drawing 904-1 Drawing 904-2 Drawing 904-3

TABLE I

WHITE WATER TREATMENT PLANT

DESIGN DATA

INFLUENT	
White Water Flow, GPD	600,000
B.O.D., lb/day	20,000 ^(a)
mg/l	4,000
Suspended Solids, 1b/1000 Gallons	2.0
Temperature, OF.	130
рН	6.0-7.0
Total Solids, %	0.8
SURGE AND SETTLING POND (Existing)	
Capacity, Gallons	1,500,000
AERATION POND	
Capacity, Gallons	8,250,000
Retention Time, Days	13.7
B.O.D., In, lb/day	20,000 (a)
Out, lb/day	6,000
Reduction,%	70
Aeration Horsepower, (Nameplate)	400
SETTLING PONDS	•
Capacity, Gallons	400,000
Retention Time, day	0.7 '
Suspended Solids, In, lb.	6,000
Out, lb.	2,000
B.O.D., In, 1b/day	6,000
Out, lb/day	4,000
Reduction,%	80
Temperature, O F.	Ambient
pH, Out	7.0-8.0

⁽a) This is maximum design for influent B.O.D. Average influent is expected to be 15,000 lbs.

ŧ.

WHITE WATER TREATMENT PLANT

B.O.D. REDUCTION CHART AND HORSE POWER REQUIREMENTS

B.O.D. REDUCTION CHART

B.O.D. Remaining	<u>Day</u>
(lbs)	
20,000	0
12,000	4
7,000	8
4,000	12
2,300	16

Data are based on an 80% B.O.D. reduction in 12 days with settling.

HORSE POWER REQUIREMENTS

	Normal Capacity	Maximum Design
B.O.D. Loading, lbs/day	15,000	20,000
Horse Power Required	260	347
Oxygen Demand, lbs./day	15,600	20,800
B.O.D. in Effluent, lbs/d	ay 3,000	4,000

Factors: 1.3 lb. Oxygen/lb. B.O.D. Removed

2.5 lb. Oxygen/HP/Hour

£.

WHITE WATER TREATMENT PLANT

NUTRIENT FEED SYSTEM

A Nutrient Feed System will be installed to meter nitrogen and phosphorus compounds to the white water influent. The system is designed to feed five pounds of nitrogen and 1.0 pounds of phosphorus for every 100 pounds of B.O.D. loading. This system will consist of the following:

NITROGEN FEED SYSTEM: A 20,000 gallon storage tank for storing anhydrous ammonia and auxiliary feed and control equipment will be installed. Maximum usage rate will be 1,000 pounds of ammonia per day.

PHOSPHORUS FEED SYSTEM: A rubber-lined steel tank or plastic tank will be installed to store phosphoric acid. This tank will have a capacity of 10,000 gallons. The nutrients will be metered into the influent pipe line just before it enters the aeration pond.

EXCAVATION, GRADING AND SITE WORK

1. General

- A. By way of general description, this Division includes the following major items: site clearing, excavation, construction of embankments, respreading of top soil and finish grading.
- B. Not included are such items as: excavation and backfill for installation of piping, concrete overflow boxes and manholes, seeding.

2. Soil Conditions

Soil borings were taken by Materials Testing Consultants, Inc., on March 26, 27, 28, 31 and April 1, 1969. The location and description of these borings have been reproduced and appear at the end of this Division.

J. Site Clearing

- A. Contractor shall remove from the areas within the grading limits all grass, brush, shrubs, trees, etc. Burn or remove this material from the site.
- B. All topsoil shall be stripped from all areas within the grading limits where embankments or cut sections occur. Stockpile this material on the site for reuse.

4. Excavation

A. Excavate to the ines, elevations and grades shown to a tolerance of + 0.2 feet. Allow for placement of stabilized gravel or concrete slope protection. B. All waste cut material is to be the property of the Owner. Dispose of this material at the Owner's directions.

5. Construction of Embankments

- A. Embankments shall be constructed to the lines and grades shown on the plans. The sandy material that is excess cut may be used for embankment construction.
- B. Compaction for all fill material placed in embankments shall be not less than 90% of maximum density at optimum moisture as determined by AASHO-T180, as outlined in the Field Manual of Soil Engineering. Fill shall be placed in layers. Tests shall be made where directed by the Engineer. Tests shall be made by an independent, approved testing laboratory. The cost of such tests will be borne by the Owner.
- C. The Contractor shall take particular note of the clayey material section required in the entire length of the south (river) side embankment.

 This clayey section shall be of the dimensions shown on the drawings, and shall have a Unified Soil Classification of GM-GG or SM-SC as shown on the sheets attached at the end of this section. The plasticity index shall be between 4 and 7. It shall be placed and compacted as described above.

6. Finish Grading

A. Rough (machine) grade to uniform levels and slopes. Grades not otherwise shown shall be uniform levels or slopes between points shown or between points and existing finished grades which are to remain.

MEN00144

- B. Provide a firmly compacted base of stabilized gravel of 8" as shown on the plans. Stabilized gravel aggregate shall be equal to Michigan State Highway Department Specification 22A, Article 7.02 and 7.03.
- C. Place 4" of top soil on all slopes and surfaces of all embankments or cut sections where no concrete slope protection or stabilized gravel is shown. Seeding and fertilizing will be by the Owner.
- D. Rip-Rap shall be dumped along the river line of the south side of the south embankment as directed by the Owner or Engineer. Rip-Rap shall be stone or broken concrete pieces with a volume of not less than one (1) cubic foot. Least dimension of each piece shall be 6".

7. Miscellaneous Construction

A. Furnish and install as shown on the drawings the 12 gauge guard rail, terminal sections, and wood posts. Guard rail shall be shop prime painted and field finish painted with one coat of an approved rust inhibitive paint.

-3-----

CONCRETE WORK

1. General

- A. All reinforced and unreinforced concrete, including reinforcing steel, which is poured at the site is included in this Division.
- B. Also included in this section are stop log grooves, wood, and manhole covers.
- C. Sleeves or PVC flanges for pipe will be furnished by others, but installed by this Contractor.

2. Materials

- A. Portland Cement: ASTM C150, type I.
- B. Coarse Aggregate: Limestone, in accordance with ASTM C33, except a total of 3% deleterious material will be acceptable.
- C. Sand: Clean, hard, durable, uncoated grains free from silt, loam, or clay. Sharp and adequately graded.
- D. Water: Clean and potable.
- E. Air Entrainment: In accordance with ASTM C260.

3. Forms

- A. Forms shall conform to the shape, levels, lines and dimensions shown on the drawings, shall be substantially constructed and braced, and shall be sufficiently tight to prevent mortar leakage.
- B. Walls shall be formed of Douglas Fir (form grade) plywood contact surfaces or smooth metal forms. Form ties may be used if in accordance with manufacturer's recommendations.

C. Forms, their braces and supports shall be removed such as to insure the complete safety of the structure. Wall forms shall not be removed, in any case, in less than four (4) days. After formwork is removed, point and patch pockets, holes and tie depresaions.

4. Concrete

- A. Ready-mixed in accordance with ASTM C94.
- B. Air Entrainment: All concrete shall be air entrained to provide $6-1/2\% \, \stackrel{+}{=} \, 1-1/2\% \, \text{ entrained air.}$
- C. Slump: Maximum slump for overflow boxes and manholes shall not exceed

 5 inches. For slop protection, maximum slump shall be 3 inches.
- D. Overflow boxes and manholes: 3000 psi minimum compressive strength and shall contain not less than 5-1/2 sacks of cement per cubic yard. Slope protection concrete: minimum 4 sacks of cement per cubic yard.

5. Tests

- A. Contractor shall furnish and pay for a reasonable number of tests of concrete strength and slump.
- B. One test (two standard cylinders and a slump determination) shall be taken from significant pours of structural concrete. Testing slope protection concrete will not be required.
- C. Sampling, storing and testing shall be made in accordance with applicable ASTM procedures.
- D. Testing shall be done by an independent testing laboratory. One copy of all test results shall be sent directly to the Engineer.

6. Placing Concrete

- A. Place in accordance with good area practice to prevent segregation of aggregate, form damage, any additional water, any dusting with cement, re-vibration, lateral placement using vibrators, uneven placement in walls, cold joints, etc.
- B. Mechanical vibration equipment, or other approved means, shall be used to thoroughly consolidate the concrete, completely embed reinforcement, and to prevent cavities and honeycombing. Vibration time shall be limited to prevent segregation.
- Cold weather shall require that the ready-mix temperature, at the job site shall be between 55° and 85° F. After placement, the concrete shall be maintained at not less than 70° F. for three (3) days or 50° F. for five (5) days. Cooling of concrete afterwards shall not be faster than 1 degree F. per hour for 24 hours and 2° F. per hour thereafter. Carbon dioxide shall be vented away from green concrete work.
- D. Hot weather shall require wetting forms and continuous dampening with an approved curing compound and curing procedure to prevent drying of the surface for at least 3 days.

7. Reinforcing Steel

All reinforcing steel shall be ASTM A615, grade 40, furnished and placed in conformance with ACI 301, Chapter 5.

8. Miscellaneous Items

- A. Waterstop: W.R. Meadows Type No. 4316 PVC waterstop or approved equal.
- B. Stop Log Grooves: Type 304 stainless steel, 1/4" thick, dimensions as shown on the drawings.

3

MEN00148

- C. Wood stop log planks: Heart face select and better cypress. Dress to 3-3/4".
- D. Manholes Covers and Frames: East Jordan #2920, or approved equal.

OVERFLOW PIPES AND VALVES

1. General

- A. By way of general description, this Division includes all labor, materials, and equipment necessary for completion of the overflow piping, including valves, fittings, and excavation and backfill for same.
- B. Not included are: excavation and backfill for embankment construction, manhole covers and frames, lagoon influent line piping (by Owner).

2. Pipe and Materials

- A. All overflow piping shall be with Colonial 12" schedule 40 PVC pipe with .406 wall thickness. Flanges, for connections to fittings and valves, shall be PVC, standard ASA drilling, solvent welded to pipe in conformance with manufacturer's recommendations. Pipe sections shall be belied and solvent welded where connected in conformance with manufacturer's recommendations.
- B. Fittings for PVC pipe shall be Type 316 stainless steel, heavy coated on the exterior with a bituminous material as recommended by the manufacturer.
- C. Corrugated metal pipe sleeves, where shown on the drawings, shall be 18", 14 gauge, galvanized and full coated.
- D. Steel Pipe: 12" schedule 40, ASTM A120, complete with fittings as necessary.
- E. Valves: Fabri-Valve Company of America, Fig. 141, 12" Wafer Bonnetless

 Stock Valve. Provide support for valves in manholes where

 shown on the drawings.

3. Excavation and Backfill

Trenching for all underground pipe lines shall be excavated to the required depths. Trenching in the vicinity of embankments shall be done after the earth embankment construction is complete. The bottom of trenches shall be tamped hard and graded to secure the required fall. Bell holes shall be excavated so that the pipe will rest on solid ground for its entire length. This Contractor will repair all damage and remove all earth resulting from cave-ins. Backfill as soon as possible after laying pipe. Tamp earth for a depth of at least one foot above pipe top.

No building rubble or debris shall be used for backfilling. There shall be a minimum of one foot of earth surrounding all PVC pipe. Extreme care shall be taken in handling and installing PVC pipe to avoid breakage. Where PVC pipe is not encased in corrugated metal pipe, mark location of pipe so that vehicles may not drive over the pipe.

4. Workmanship

All materials and equipment shall be installed and completed in a first class workmanlike manner. Installation of all pipe and materials shall be in strict accordance with manufacturers' recommendations and specifications.

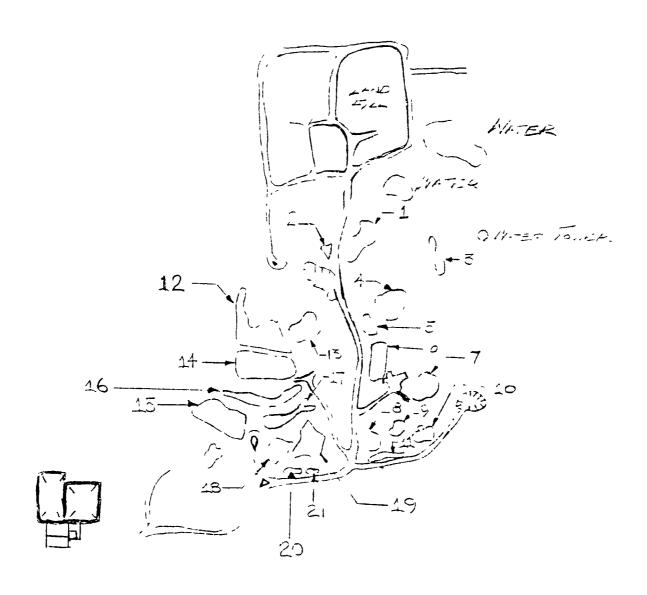
HISTORY OF SLUDGE AND LIQUOR PONDS NORTH OF RIVER ROAD

DOCUMENT #9

The sludge ponds came into use in the early 1970's, shortly after the #1 clarifier was constructed. The first ponds were natural depressions in the terrain. As the need arose, several ponds were dug. In the 1980's some of the ponds were used for storage of liquor solids when storage became short.

In 1984 the decision was made to construct containment structures for both liquor and sludge. A planned closure of the ponds took place from 1983 to 1986. Much of the liquor was used as impervious cap for the on-site landfill. The sludge was sprayed onto the surrounding area as fertilizer for reconstructive growth.

The liquor and sludge solids were tested for various parameters. It is not expected that PCB's would be found in either by-product.





MENASHA CORPORATION

PAPERBOARD DIVISION

STSEGO MICHIGAN

DRAWING NUMBER

2352 - - -



October 19, 1983

Gaylyn Kilmore MDNR Ground Water Division 621 10th. Street Plainwell, MI 49080

Dear Mr. Kilmore,

Attached for your review and approval is a copy of our plan for the closure of the unlined waste water sludge ponds. Basically, the plan is to relocate the existing ponds, recontour the area and use the sludge on the recontoured area to build up the humus in the soil. The area would be shaped to provide a well-draining finished grade. The resulting slope will be seeded to grass.

The closure of the sludge ponds will push us very near compliance with Part 22 of the Ground Water Quality Rules.

Please feel free to contact me if you have any questions.

Sincerely,

MENASHA CORPORATION

Herb Smiley Project Engineer

SECTION A

SCOPE OF THE PROJECT

The project as proposed by Menasha Corporation consists of three phases:

First Phase:

The first phase is to be complete before the end of 1983. It involves relocating the volume of (11) ponds to (3) existing ponds. The area would be recontoured and protected from erosion.

Second Phase:

The second phase would be complete in 1984. It consists of spreading the sludge on the recontoured area. As the remaining ponds are emptied, they will be filled in and sludge will also be applied to these areas. Once the sludge ponds are closed, the area will be seeded to grass.

Third Phase:

The third phase will also be completed in 1984, in conjunction tion with the second phase. It will address the two mixed content ponds. Further study of the area will be required before a formal proposal will be presented on the closure of ponds.

NATURE OF EXISTING FACILITIES

Sludge storage is presently accomplished in (22) separate unlined earthen basins randomly spotted on a gradually sloping hillside northeast of the mill.

A survey of the ponds (copy attached as Appendix A) shows total pond area of 314,000 square feet (7.2 acres), containing a total sludge volume of 7.2 million gallons. All but two of the ponds contain sludge from the mill wastewater treatment plant. Two of the ponds (#2 and #12) having a total area of 0.7 acres contain 2.3 million gallons of a sludge mixture which includes material removed from ash ponds and the mill's liquor ponds, in addition to wastewater sludges.

The wastewater sludges are applied to agricultural land as a routine practice. Storage in the ponds normally occurs during winter periods.

The material in ponds #2 and #12 are not suitable for land application, and alternative management methods must be identified for the contents of the ponds.

PROPOSED REMEDY

The sludge pond closures will be conducted in three phases. The first phase will be accomplished yet this year. We are proposing to empty sludge ponds #4, #5, #8, #9, #10 and #11 into sludge ponds #6 and #7; and #16, #17, #19, #20 and #21 into sludge pond #18.

The sludge will be pumped from pond to pond. There may be very thick sludge in the bottom of the ponds, and our plans are to bury the sludge in-place. The ground water flow and the mill plant wells are located such that a small amount of sludge remaining in the bottom of the pond will have no effect on the ground water in the surrounding area (Appendix B).

The ponds were created for the most part by constructing dikes along naturally sloping terrain features to create the impoundments. It is planned that the dikes will be removed with earthmoving equipment after the ponds are emptied. The terrain will then be reshaped to a gentle slope.

The second phase of the project will be started in the early part of 1984. The remaining sludge ponds, #2, #6, #7, #13, #14, #15 and #18, will be used to build the humus in the recontoured area. The sludge will be spray-applied throughout the year. If possible, the sludge will be disked into the soil. As the ponds are emptied, they will be shaped to provide a well-draining finished grade.

Once the ponds are emptied, the area will be shaped with sufficient overfill to allow for at least 10% settlement to prevent ponding. The resulting slopes will be seeded to grass. Regular inspections will be conducted thereafter to identify any areas of ponding or "potholes", which will be reshaped if needed.

The third phase of the project involves the closure of ponds #2 and #12. Developing a closure plan for these ponds will involve more field decisions because the contents are a nonhomogeneous mixture which is not suitable for land application. We will study this closure in depth and present a closure plan in 1984.

APPENDIX B

GROUNDWATER FLOW AND WELL LOCATION

The following information is taken from the "Sanitary Landfill Hydrogeologic Investigate" study for Menasha by CH2M Hill, April 1981.

GROUNDWATER OCCURRENCE AND MOVEMENT

Beneath the landfill site area, groundwater occurs within the pore spaces of the sediments comprising the glacial deposits. Below the water table, the pores are completely saturated. Above the water table in the unsaturated zone the pore spaces are only partially filled with water. Within this zone the direction of groundwater movement is essentially downward. However, the downward percolation of water may locally be impeded or the direction altered by small impermeable lenses of glacial till or clay. Beneath the water table groundwater follows the hydraulic gradient from areas of high groundwater elevation to areas of lower groundwater elevation.

The bedrock ridge appears to extend to a high enough elevation so it does not have free groundwater occurring on top of it.

Figure 7 is a portion of the USGS Otsego Quadrangle which shows the area's general topography. We have depicted the trend of this bedrock ridge as probably being toward the dam site on the river (see Figure 7), but this is only inferred. Figures 8, 9, and 10 present topograpic cross sections that illustrate the relationship of the landfill to the area's topography. Locations of the sections are presented in Figure 7.

Based on the water level data gathered to date, the groundwater flow direction appears to be to the west-southwest in the area of the site. This localized condition beneath the site is probably caused by the bedrock ridge which does not allow the regional table to flow directly toward the river as the topographic cross sections and the position of the Kalamazoo River with respect to the landfill would suggest.

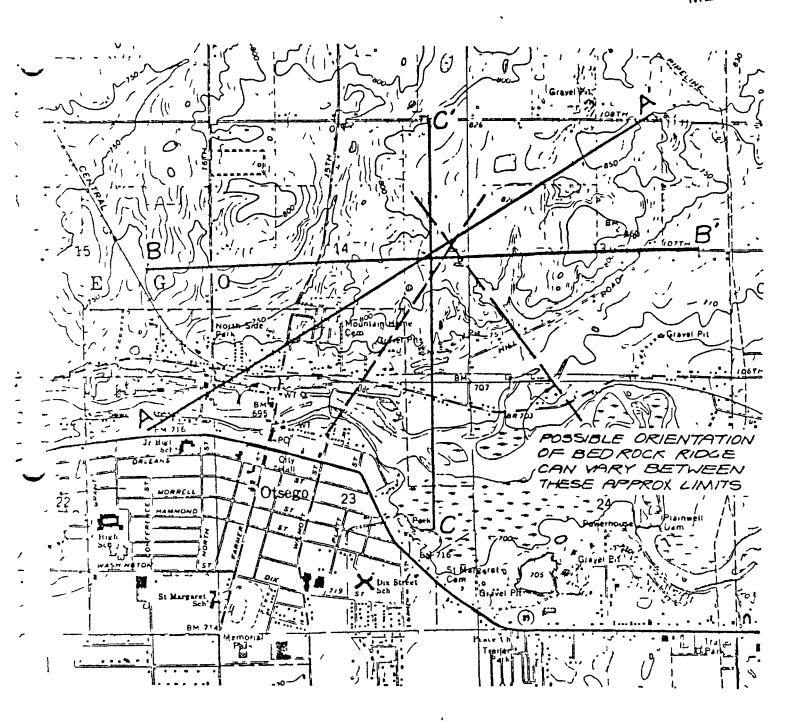


FIGURE 7 SECTION LOCATIONS

APPLICATION FOR PERMIT

			ON FUR PERIMI		
Corps of Engineers Department of the Army	Corps Process (······	State of Michigan Department of Na Land Resource Fi	tural Resources	0
	PLEASE READ INSTR	UCTIONS BEFORE FIL	LING OUT THIS API	PLICATION - PRINT OR TY	PE
NENASH a	CEPP.		AGENT/CONTRACTO	R (tirm name if known)	
ADDRESS 320 N, Far CITY OFS + 90 M TELEPHONE (Work) G16 - 6 12 ((Home)	mer St	•	ADDRESS		
Ofsego M	1chigah	49078	CITY		STATE ZIP
(Work) 616 - 6 12 ((Home)	39-0	AITY OF FED. I.D NO. 4 64 - 6 8 0	TELEPHONE		
2 If applicant is not owne letter of authorization f OWNER'S NAME	r of the property where	the proposed activity	will be conducted, pr	ovide name and address of o	wher and include
3. PROJECT LOCATION	Streev Road	Village		900Y OF WATER (Lake	. stream creek pond, or grain
County		Town Rang		GUN RI Subdivision or Plat Lot	No. Private Claim
Allegan 4 PROJECT INFORMATIO	Ofseyo	Otsigo IN 12	W 14	SEYY	
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				stalled along	
(b) Attach drawings of the	proposed activity pre	pared in accordance w	oth the DRAWING RE	9005 fo the Go	2 of Instructions.
(c) Check appropriate Pri	piect Type (below)			See Samples of Dr	
1) 🖾 Dredging, Filling, D Lakes or Streams.	raining or Constructio Great Lakes Bottomiar	n Work in Inland nds or Welland Areas			1. 2. 3. 4. or 5
2) Work in Riverine F	lood Plain	(See SPECIAL INST	RUCTIONS, Section 1	, on back of this form)	6
				, on back of this form)	
NOTE: If boxes 2, 3 and/o	r 4, above, are checked	d provide appropriate a	inditional information	on the back under "SPECIAL	INSTRUCTIONS"
(c) PROPOSED USE: (Check appropriate be	1. Public;	Private: Commi	ercial: Other (sp	ecify)	k) 🛮 No 🗆 Yes
(e) Location of Source of					
County Towns	nip Required	Town	Range	Section	% Section
Further Description (provide vicinit	y map of Source Site (Sample	Drawing 5) if more than 50) cubic yards and source is	other than commercial)	
					
(f) Dredge Spoils Dispos		Town	Range	Section	V. Section
Allenan Of	5290	1 M	12 h/	19	SE 14
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Orgin Will On (g) Describe any project	Menes has Pragatternatives considered	The county h	to fill in L	ow spots along tene Orden Alba in yd.	TENEROUS.
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(h) Date activity will com				mpleted 31 0c + 80	
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720				49078-015	5

- State why you believe the project	will not cause pollution imp	air or destroy the water or	any natural renova	MEN00161
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Settle unt before				
6 List all other Federal State or los			for proposed project.	
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County Oral Commission - Fa		11/22/85.		
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State reasons if permit denied				
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		~ -		
8 Adjoining Riparian (Neighboring W	Votations Branchi Owner No.	me and marked accress at	which they may be seen	
same of Ringrian #1	Address	City	State	<u>:</u> °
Harry Steinberg 1	391 Hill Road	Otsego	MI	40018
Name of Riparian #2	Address 4+ En StereDe C	Cer Cuy	State	ZIP
Conrail 882	Hynes Ave. St.	Grond Rupi	AS MI	49503
Conrail 882 Name and Address of Lake Association Kenneth Kling 1	1381 Hill Road	Otseso MI E	SUM	49078
		•		
9 Application is hereby made for a		Y BEFORE SIGNING. re the activities described b	serein I certify that I am i	amiliar with the
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APPLICATION AND PERMI

MEN00162

CRA100 Rev 5/86 Permit Number 150

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to construct, operate, maintain use and/or remove within a county

Issuan	се	Dat
10/22	18	Ŀ

road rigi	nt-of-way 10/22/86
BOARD OF COUNTY ROAD COMMISSIONERS ofALL	EGAN County, Michigan
ADDRESS: 1308 Lincoln Road, Allegan, MI 49	
PHONE: (616) 673-2184	
If applicant hires a contractor to perform the work, BOTH n	
the provisions of this Application and Permit.	itusi complete tilis form and borri assume responsionity for
APPLICANT	CONTRACTOR
NAME: Menasha Corporation	NAME: Engel Construction
MAILING ADDRESS: P.O. Box 155	MAILING ADDRESS:
Otsego, MI 49078	Kalamazoo, MI
TELEPHONE NO.	TELEPHONE NO.
Applicant's Signature Title Carp. Err. Marzon. Date: 10/22/16	
Applicant's Signature	Contractor's Signature
Title Corp. Err, Transpor. Date: 10/11/16	Title Date:
FINANCIAL REQUIREMENTS	ATTACHMENTS REQUIRED
Application Fee \$ Permit Fee \$	Plans and Specs.
Est. Inspect. Fee \$	Plans and Specs.
Bond \$	Bond
Deposit \$	Proof of Insurance
Other \$	Yes No
To Be Billed \$	
Receipt Number	P.I. \$ P.D. \$
Dated	Other
APPLIC	ATION
Applicant and/or Contractor request a Permit for the purposed following location:	se indicated in the attached plans and specifications at the
CITY	go SECTION 13 & 14
NAME OF ROAD Hill Road between	
for a period beginning 10-22-86	and ending10-24-86
and agrees to the terms of the permit.	and the same of th
Clean out road side ditch on Hill Roa	
Railroad tracks on west side of road.	Excavated material to be haused to
other Menasha property.	
PER	MIT
A permit is granted in accordance with the foregoing appliterms agreed to by the Permit Holder. When Applicant hires Contractor.	cation for the period stated above, subject to the following
	BOARD OF COUNTY ROAD COMMISSIONERS
RECOMMENDED FOR ISSUANCE:	Allegan COUNTY, MICHIGAN
	By
Investigator	Trud Deid
	By

2332

_ Date

Ву __

_ Title

STATE OF MICHIGAN

		DEPAREMENT OF NAT	UKAL	KESUU	NCE3		.,	
		: PERM	TIN		Γ	 		
					1	Permit No.	85-12-437	
						Date Issued	July 7, 19	986
					1	Extended _		
						Revised	Dogombox 21	1007
	1					Expires	December 31,	1907
	s s r	~	This no	rmit is	∟ Oranted :	under provi	sions of	
	U Menasha Corporation	+			_		Act, 1972 P.A. 346	as amended.
	E 320 North Farmer St		_				ands Act, 1955 P.A.	
	Otsego, Michigan 4	9078			-	•	29 P.A. 245, as ame	
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Wat	er Course Affected	County	Town	Range	Sect.	Sub. and Lo		
	Gun River	Allegan	111	12W	14	105th 8	St., Otsego	
	Authority granted by this permit is subjet	■ to the following limitation	s:					
	A Initiation of any work on the permitted project confi B The permittee in exercising the authority granted by							nded
	C. This permit shall be kept at the site of the work an	available for inspection at all times	during th	e duratio	n of the pro	ect or until its	date of expiration	
	 All work shall be completed in accordance with the No attempt shall be made by the permittee to forbit 							n
	F It is made a requirement of this permit that the permit that act	me give notice to public utilities in acco	rdance wit	h Act 53 c	of the Public	Acts of 1974 an	d comply with each of the	requirements of
	G This permit does not convey property rights in either re			ry to priv	ate property	or invasion of pu	iblic or private rights, nor d	oes it waive the
	necessity of seeking federal assent, all local permits H. This permit does not prejudice or limit the right of a	riparian owner or other person to instit	tute proce-	edings in	any circuit c	ourt of this stat	e when necessary to prote	ct his rights
	Permittee shall notify the Department of Natural Reso preaddressed post card to the office addressed ther		etion of th	e activity	authorized b	this permit by	completing and forwarding	ig the attached.
	J. This permit shall not be assigned or transferred with	hout the written approval of the Depa						
	K. Work to be done under authority of this permit is for	unther subject to the following special	i ilistructio)115 BIIU 3	pecinications			
	All dredge spoils including (
	above the ordinary high water							
	and mulched, in such a manne	r as not to erode i	.nto a	my wa	aterboo	My, wetl	and or flood;	olain.
	Authority granted by this pe	rmit does not waive	nern	ut re	equire	ments un	der the Soil	Frosion
ć	and Sedimentation Control Ac	t, Public Act 347,	or th	e nee	ed to a	acquire	applicable ps	ermits from
1	the County Drain Commission.	Contact Lynn Flem	ning,	Alleg	gan Coi	inty Dra	in Commission	mer, 108

Chestnut St., County Building Annex, Allegan, MI 49010, phone 616-673-8471.

cc: DERP, Lansing D-12 Law Allegan CEA (Fleming) City of Otsego Otsegn Two.

GORDON E. GUYER Director, Department of Natural Resources

PR 2 Rev 4

MEN00165

PERMITHOLI

Expiration Date: 9-30-86

Lot # Sec. 14 Name: Menasha. Corporation

A & L GREAT LAKES AGRICULTURAL LABORATORIES, INC.

5011 Decatur Road • Fort Wayne, Indiana 46806-3085 • Phone: (219) 456-3545



WATER ANALYSIS

REPORT NUMBER F210-63A

CUSTOMER # 59013

SEND TO:

ATTENTION:

REI

MENASHA CORP-SLUDGE PROJ

AL SWITZENBERG

COPY TO:

MENASHA CORF.

P.O. BOX 155 OTSEGO MI 49078

DATE: 08/01/86 PAGE ! 1

SAMPLE ID: OVERFLOW FOND

LABORATORY #: W07058

REQUESTED ANALYSIS	VALUE	TINU
Copper (Cu)	**	ppm
Zinc (Zn)	***	l.bu
Cadmium (Cd)	**	p p m
Chromium (Cr)	*	ք թ տ
Lead (Fb)	***	ppm
Nickel (Ni)	***	p p m
Mercury	****	ppb

COMMENT: * Below detectable limit of 1 ppm. Below detectable limit of 0.1 ppm. *** Below detectable limit of 0.02 ppm. *** Below detectable limit of 0.5 ppm. **** Below detectable limit of 0.5 ppb.

Test Results

Sludge Pond Closure

Ground Water 48



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N E , GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E, HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

H EDWARD PREIN PE R L S
THOMAS NEWHOF PE
WILSON D McQUEEN PE
LARRY D WILSON PE
MICHAEL S FULLER PE
PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
ROBERT J REIMINK PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

September 3, 1986 77129

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Sample Liquor Sludge 8/5/86, received 8/8/86

LABORATORY RESULTS

I. EP Toxicity Leachate Concentrations

III. Volatile Organics Scans 601, 602;

Final pH		5.1
Arsenic, mg/L		0.010
Barium, mg/L		1.8
Cadmium, mg/L		0.840
Chromium, mg/L		0.10
Copper, mg/L		0.09
Lead, mg/L	<	0.03
Mercury, mg/L		0.0040
Selenium, mg/L	<	0.005
Silver, mg/L		0.09
Zinc, mg/L		1.74
Cyanide, mg/kg	<	0.02

PREIN & NEWHOF

None detected, < 1 mg/kg

Jane Hoch

Lab Log #1256

II. Total

2283



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES

3000 EAST BELT LINE N E., GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E, HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

77129

September 3, 1986

H EDWARD PREIN PE R L S
THOMAS NEWHOF PE
WILSON D McQUEEN PE
LARRY D WILSON PE
MICHAEL S FULLER PE
PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Sample #1, Water Pond #1- 8/5/86, Received 8/8/86

LABORATORY RESULTS

I. EP Toxicity Leachate Concentrations

Final pH		4.9
Arsenic, mg/L		<0.005
Barium, mg/L		0.4
Cadmium, mg/L		0.015
Chromium, mg/L		0.04
Copper, mg/L		<0.03
Lead, mg/L		<0.03
Mercury, mg/L		0.0070
Selenium, mg/L		<0.005
Silver, mg/L		<0.02
Zinc, mg/L		0.238
II. Total Cyanide, mg/kg		<0.2
III. Total Organics Scans 601,602:	None detected	<1 mg/kg

PREIN & NEWHOF

Jane Hoch Chemist



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES 3000 EAST BELT LINE N.E., GRAND RAPIDS, MICHIGAN 49505

3000 EAST BELT LINE N.E., GRAND RAPIDS, MICHIGAN 49505 285 JAMES STREET, SUITE E, HOLLAND, MICHIGAN 49423 TELEPHONE (616) 364-8491 TELEPHONE (616) 399-9218

H EDWARD PREIN PE, R L.S THOMAS NEWHOF P.E WILSON D. McQUEEN PE. LARRY D. WILSON PE. MICHAEL S FULLER P.E. PHILIP C. GLUPKER P.E JAMES A. COOK P.E ROBERT J. VANDER MALE P.E. ROBERT J. REIMINK P.E. RICHARD L. SERBOWICZ P.E. ARTHUR W. BRINTNALL R.L.S. REX A. MILLIRON R.L.S

September 3, 1986 77129

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, Michigan 49078

RE: Overflow Pond, 7/31/86 received 8/8/86

% Solids in Sample: 0.3%

LABORATORY RESULTS

I. EP Toxicity Leachate Concentrations

Arsenic, mg/L		0.005
Barium, mg/L	<	0.1
Cadmium, mg/L		0.005
Chromium, mg/L	<	0.04
Copper, mg/L	<	0.03
Lead, mg/L	<	0.03
Mercury, mg/L		0.0060
Selenium, mg/L	<	0.005
Silver, mg/L	<	0.02
Zinc, mg/L		0.248
II. Total Cyanide, mg/L	<	0.005
III. Volatile Organics Scans 601,602: None	detected, <	1 ug/L

PREIN & NEWHOF

Jane Hoch Chemist

SLUDGE PONDS

2860 Dry Tons

KNOWN

Sludge Volume: 17,152,000 gallons at 4% solids - Spraying

Consistency

20 Acres of available land (Menasha). 30 Acres

1 Acre can handle 25 ton per season.

Hauling cost 1-1/2¢ per gallon (Menasha).

No MDNR mandate for closure/land application.

Hauling outside is 2¢ per gallon (Minimum).

Wet summer - No spraying.

Capital equipment cost: \$30,000 for spraying.

1 Truck can haul 4 loads per shift (8,700 gallons per load).

Need additional 260 acres for land disposal.

4 ponds in question as far as closure plan.

8 sludge ponds we can land apply.

BEST CASE (COST)

4 Years spraying.

Equipment cost - \$40,000

Labor - \$45,000

Operating cost -\$24,000.

Landscaping - \$70,000.

Not including (4) ponds in question.

Maintenance (3 years) \$33,000

= \$212,000.

22%

WORSE CASE (COST)

1 Year spraying and Hauling Spray 4-1/4 million gallon; Haul 13 million gallons.

Equipment cost - \$100,000...

2¢ per gallon (tank farm to field). \$260,000.

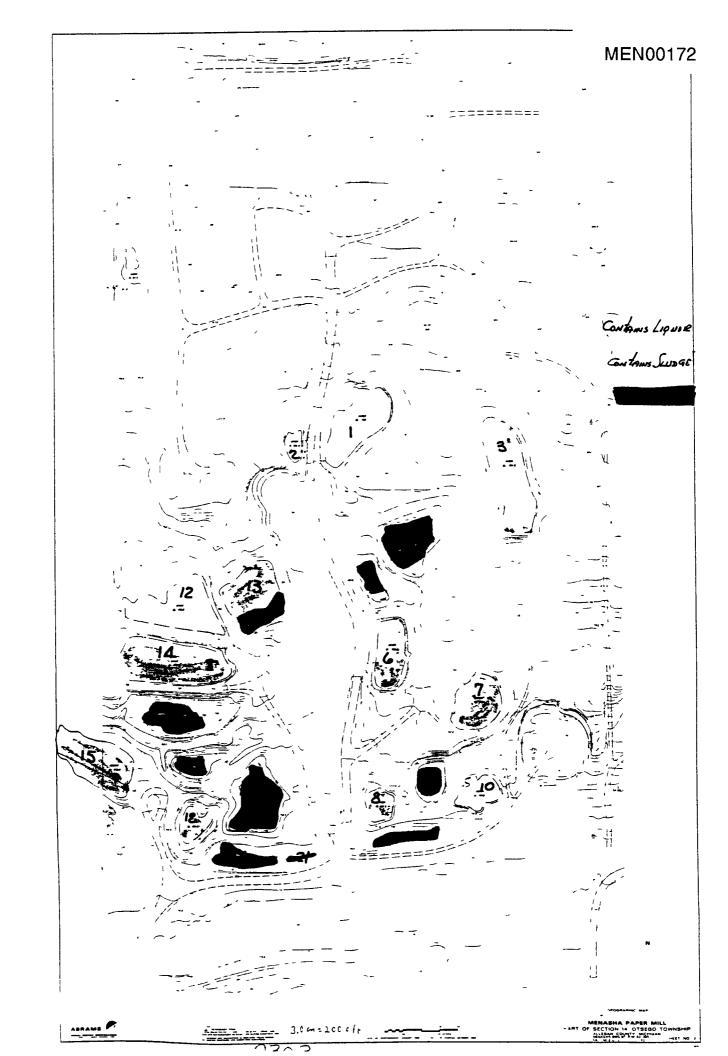
Labor, spraying and to tank farm - \$20,000.

Equipment operating cost - \$15,000.

Landscaping - \$70,000.

Not including (4) ponds in question.

= \$465,000.





September 2, 1986

Harry Steinberg 1391 Hill Road Otsego, MI 49078

Dear Harry,

As discussed with you previously, Menasha Corporation would like to drain the storm water impoundment, located on the Northeast corner of Menasha, s property, to the natural drainage pattern which goes across your property and then into the Gun River. After draining the storm water impoundment, Menasha would be removing a portion of the dike on the South East end of this impoundment next to your property line. Menasha would then install a tube under your road from the impoundment to the natural drainage area on the East side of your road. This in effect would restore this areas natural drainage pattern as it existed prior to 1973 when the dike was constructed. The only difference would be that the storm water run-off would cross your road through the tube rather than over the road as it did previously.

If you agree and consent to this proposal, please indicate this by signing both copies of this letter and returning one of them to us for our files.

Sincerely,

Otsego Paperboard Division

John R. Blauwkamp, P. E.

Corporate Environmental Manager

In R Blauwborp P.E.

I Harry Steinberg agree to the content of this letter.

7-11-89

Date

Harry Steinberg



August 20, 1986

John Vollmer Surface Water Quality Division MDNR Plainwell, MI 49080

Dear John:

Following are the BOD test results completed on samples during the lowering of "Lake Menasha". Enclosed is a copy of the metal analysis completed by A & L Great Lakes Agricultural Laboratories, Inc.

BOD

7/16/86	before pumping	1.1	ppm
7/17/86	pumping	19	ppm
7/18/86	pumping	15	ppm
7/31/86	end of pumping	14	ppm

Approximate gallons pumped: 1.5 million.

Thank you for your cooperation in helping Menasha insure a safer environment.

Sincerely.

Otsego Paperboard Division

Strylia K ones

Sandra K. Jones

Corporate Environmental Engineer

cc: J. Blauwkamp

J. Bonham

k j

A & L GREAT LAKES AGRICULTURAL LABORATORIES, INC.





WATER ANALYSIS

REPORT NUMBER F210-63A CUSTOMER # 59013

SEND TO:

ATTENTION:

REI

MENASHA CORP-SLUDGE PROJ AL SWITZENBERG

COPY TO:

MENASHA CORP.

P.O. BOX 155 OTSEGO MI 49078

DATE: 08/01/86

PAGE: 1

SAMPLE ID: OVERFLOW POND

LABORATORY #: W07058

REQUESTED ANALYSIS	VALUE	TINU
place along gainst gain		
Copper (Cu)	**	ppm
Zinc (Zn)	***	թթա
Cadmium (Cd)	**	ppm
Chromium (Cr)	*	ppm
Lead (Pb)	***	ppm
Nickel (Ni)	***	րբա
Mercury	****	ppb

COMMENT: *

* Below detectable limit of 1 ppm.

** Below detectable limit of 0.1 ppm.

*** Below detectable limit of 0.02 ppm.

**** Below detectable limit of 0.5 ppm.

***** Below detectable limit of 0.5 ppb.

TO:

T. E. Clemmons

DATE: August 25, 1986

SUBJECT: Sludge Pond Closure

Project Update

FROM: Ron Thaxton Project Engineer

The sludge pond closure project as originally defined has been completed with the exception of the following.

1. Closing roadway areas.

Placement of deflectors to reduce washouts in some drain areas (mainly straw bales or rocks).

3. Seeding open reworked areas.

On May 29, 1986 a meeting was held to discuss the sludge pond closure project and other areas of concern in the sludge pond vicinity. Those that attended were John Blauwkamp, John Bonham, Al Switzenberg, Sandra Jones and myself. John mentioned that there are other problem areas to be addressed as follows:

<u>Lake Menasha</u> - Samples were taken and sent in for analysis. It will be necessary to drain the water down and install a permanent overflow pipe to maintain a controlled level in the pond. This also requires installation of a ditch from the Lake Menasha pond east to the ditch along the hill road to allow overflow from the pond to be directed to Gun River.

Area along south side of Lake Menasha - Has what appears to be traces of liquor. Samples have been sent for analysis and if found to contain liquor, will have to be hauled to a designated landfill.

Pond located just east of old landfill area - Has also shown some traces of sludge which could have washed into the pond from previous spraying in the field north of the pond. The pond will require being pumped down and bottom being checked for sludge. it is believed it will not be a problem.

As soon as a direction is determined from samples taken and the County Road Commission's decision on the ditch along the hill road, we will be able to submit a proposal to continue with the project on Phase II.

m

- c J. Blauwkamp
 - J. Bonham
 - S. Jones
 - A. Switzenberg

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

November 5, 1986

Menasha Corp.

Reference is made to the 80 acre parcel located in the S.E. corner of sec 14, Otsego Twp.

Al Switzenberg and I looked at a severe gully problem in the approximate center of this land, we discussed possible solutions and also discussed possible seed mixtures on the surrounding land.

I visited this parcel again on Nov 5 and have the following information to offer.

Soils in this area are mapped as "Marlette" soils. Soils of this type do not normally Yield high rates of run-off. The soil on this parcel, however has been reworked, has probably had fairly heavy applications of sludge and appears to be compacted. This results in higher than normal run-off rates. It is also probable that the series of ponds, that existed in the past, offered some temporary storage, thereby reducing run-off rate.

Run-off concentrates along the old sanitary land-fill access road causing a severe gully problem.

The upper half of the existing gully along the access road is on a very steep grade and will be difficult to stabilize using normal methods. Al and I discussed the possibility of a stone lined channel in this steep area. If properly constructed, it might work, but I believe the construction cost will be high.

Another possibility is to provide some temporary flood storage areas by means of diking and/or digging. Water from these temporary storage areas would be metered out *Thru* an underground conduit to a point where it could be safely discharged. (downstream from the steep part of existing channel.)



UNITED STATES DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE

(2)

Menasha Corp.

It may be difficult to get a significant amount of temporary storage behind a dike because of existing land slopes.

I believe a conventional waterway can be built on the lower portion of the existing channel (where a flatter grade exists). The waterway configuration should be trapazoidal (flat bottom), and sized to handle the expected run-off from a 10 year storm (min). This amounts to a 3.8" rain in a 24 hr. period.

Al is in the process of establishing vegetation on the fields East and West of the lane. This vegetation, when properly established and maintained, will help to reduce run-off. The seeding also provides excellent habitat for wildlife.

A volunteer (?) stand of sweet clover exists in the west field. Existing Annual and *Perennial* weeds also help to provide cover.

I suggest re-inforcing the sweet clover where needed with 2#/ac of Timothy and 4#/ac of Smooth Bromegrass. Do not Work up the field to seed the Timothy and Bromegrass. Try brush-hogging part of field and then broadcasting seed in the Spring. This could be done on a trial basis. It's good to get some kind of grass in the sweet clover because of steep slopes.

Seeding on the open area (westerly part of west field) should be 2#/ac of Timothy, 4#/ac Smooth Bromegrass and 2#/ac of sweet clover. As in all seedings, lime and fertilizer should be applied according to soil tests.

After seedings are established, any mowing should be delayed until after bird nesting season (July 15). It is desirable to mow not more than half the field in a given year.

(Con't. page 3



UNITED STATES DEPARTMENT OF AGRICULTURE SOIL CONSERVATION SERVICE

(3)

Menasha Corp.

Because we have limited personnel and a heavy work load on cropland areas, we will be unable to do the engineering work that needs to be done. If time permits, we may be able to work on a consulative basis with the firm you hire.

I realize this is general information, but I hope it provides you with some ideas of how to correct the erosion problem.

very truly yours,

Bernard G. Haveman

Soil Conservation Technician

BH/nb

cc: Switzenberg.





November 11, 1987

Orchard Hill Landfill 3378 Hennesey Road Watervliet, Mi. 49098

Dear Sir:

Enclosed are the EP toxicity studies on three materials to be hauled to your landfill.

Sample #1, South side of digester, is an additional test run on the material previously approved on November 6, 1987. This is the soil which has been contaminated by sodium carbonate and is presently being hauled to your landfill.

Sample #2, Area of no growth at back liquor pond , is soil from a previous liquor solids clean up. This area was wet and could not be completed at that time. There is approximately 30 yards of this material.

Sample #3, Floor of weak liquor berm, is a mixture of sand and liquor solids similar to material previously hauled to your landfill. It is estimated that 300-500 yards will be removed to the landfill.

All materials to be hauled are of a nonhazardous nature.

If you have any questions please contact the writer or John Bonham.

Sincerely,

Otsego Paperboard Division

Keet L B. Kling

Keith B. Kling

Waste Treatment Supervisor

Enclosure /ac

Ron Thaxton



PREIN & NEWHOF, P.C. ENGINEERS — SURVEYORS ENVIRONMENTAL & SOILS LABORATORIES 3000 EAST BELT LINE N E, GRAND RAPIDS, MICHIGAN 49505

285 JAMES STREET, SUITE E, HOLLAND, MICHIGAN 49423

TELEPHONE (616) 364 8491 TELEPHONE (616) 399 9218

H EDWARD PREIN PE, R LS
THOMAS NEWHOF PE
WILSON D McQUEEN PE
LARRY D WILSON PE
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PHILIP C GLUPKER PE
JAMES A COOK PE
ROBERT J VANDER MALE PE
ROBERT J REIMINK PE
RICHARD L SERBOWICZ PE
ARTHUR W BRINTNALL R L S
REX A MILLIRON R L S

November 10, 1987 77129

Mr. John Bonham Menasha Corporation P O Box 155 Otsego, MI 49078

Re: Soil Samples received 10/30/87

	LABORATORY RESULTS			
<u>Parameters</u>	South Side of Digestor 0-2'	Area of no growth @ back of Liq. <u>Pond</u>	Floor of weak liquor berm	
Total Cyanide, mg/kg as received	<0.25	<0.25	<0.25	
EP Toxicity Leachate Con	centrations:			
Arsenic, mg/L	0.0024	0.0041	0.0052	
Barium, mg/L	<0.01	<0.01	<0.01	
Cadmium, mg/L	<0.006	<0.006	<0.006	
Chromium, mg/L	<0.04	<0.04	<0.04	
Copper, mg/L	0.13	0.13	0.31	
Lead, mg/L	<0.08	<0.08	<0.08	
Mercury, mg/L	<0.0004	0.0010	0.0008	
Selenium, mg/L	<0.005	<0.005	<0.005	
Silver, mg/L	0.02	0.07	0.04	
Zinc, mg/L	1.62	0.656	0.600	

PREIN & NEWHOF

Mane Hoch

Alternatives - Evaluations

Landfill and Liquer Pond Closure

Ground Water 48

ADDENDUM I
TO THE
EVALUATION OF POND CLOSURE ALTERNATIVES

- Ponds 1, 2, 10, 12 and 14 -

MENASHA CORPORATION OTSEGO, MICHIGAN

June, 1984

Prepared by:

WILKINS & WHEATON TESTING LABORATORY, INC. Kalamazoo, Michigan

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APPENDICES

Appendix A: Analysis of Fly Ash

Introduction

This report has been prepared as an addendum to the report entitled "Evaluation of Pond Closure Alternatives", May, 1984, prepared by Wilkins & Wheaton Testing Laboratory, Inc. The report contained information regarding the physical and chemical characteristics of the sludge and supernatant from Menasha Ponds #1, #2, #10, #12 and #14 and the alternatives available for their closure. Based on this study, additional information was required to pursue recommended alternatives.

The contents of the following report include the results of the field work conducted on Ponds #1 and #14, an evaluation of the consistency and permeability of the sludge in the five ponds, preliminary calculations on the capacity of the landfill, and a proposed work plan for disposal of the sludge into the landfill.

Pond #1

As discussed in the full report, Pond #1 is located in the northwestern portion of the project site, across the Menasha access road from Pond #2. The somewhat oval-shaped pond measures approximately 250 feet across the north-south axis by 125 feet across the east-west axis.

The pond was probed every 15 feet along the north-south and east-west axes (Figure 1). Probe depths ranged between approximately 2 and 12 feet. Table 1 lists the results of the field data. The maximum sludge thickness encountered was 7.58 feet and the maximum depth of supernatant was 4.33 feet. The sludge in Pond #1 is characteristic of the sludge in the other ponds in that it is black in color, fibrous, and density increases with depth. The overlying supernatant is black in color with a strong odor. The chemical characteristics of the material are comparable to the concentrations analyzed for in the full report.

Two cross-sections were constructed from the field data (Figures 2 and 3). As these figures indicate, the sludge surface and bottom is irregular with a high volume of overlying supernatant. Based on these cross-sections and the associated probing data, the volume of sludge was calculated at approximately 84,528 cubic feet. The volume of supernatant was estimated at 76,300 cubic feet (570,724 gallons).

A sample from the pond was collected near the northeastern end. A soft sediment coring device was used for the sampling. A seven-foot core of the sludge was obtained and was used in part for the consistency and permeability evaluation for comparison with other ponds.

It should also be noted that there are numerous trees and branches protruding from the surface of the pond. Much of this material is submerged in the sludge. Additionally, a delta-like deposit of granular material is located on the northwestern shore of the pond. There is the potential that sludge underlies this deposit.

TABLE 1

PROBE DEPTHS OF POND #1

Menasha Corporation Otsego, Michigan

(Surface Elevation of Pond: 782.1 feet)

East-West Traverse (beginning at west side, progressing at 15 foot intervals):

Depth to Bottom	Supernatant Depth	Thickness of Sludge	Bottom Elevation
6.75 feet	2.75 feet	4.00 feet	775.35 feet
7.50	3.83	3.67	774.60
8.17	3.83	4.34	773.93
8.42	4.33	4.09	773.68
8.92	3.83	5.09	773.18
10.58	4.25	6.33	771.52
11.67	4.08	7.59	770.43
10.67	4.33	6.34	771.43
8.83	4.00	4.83	773.27

North-South Traverse (beginning at south end, progressing at 15 foot intervals):

Depth to	Supernatant	Thickness	Bottom
Bottom	Depth	of Sludge	Elevation
8.08 feet	4.50 feet	3.58 feet	774.02 feet
10.17	4.33	5.84	771.93
9.75	4.58	5.17	772.35
10.08	4.33	5.75	772.02
9.92 9.33 8.92	4.00 4.17 3.92	5.75 5.92 5.16 5.00	772.18 772.77 773.18
9.17	4.00	5.17	772.93
7.33	3.17	4.16	774.77
6.58	2.67	3.91	775.52
5.25	2.25	3.00	776.85
3.83	1.50	2.33	778.27
3.67	2.00	1.67	778.43
3.50	1.92	1.58	778.60
2.00	1.50	0.50	780.10

Pond #14

Pond #14 is located adjacent to the southern side of Pond #12 in the western portion of the project site. An overflow pipe from Pond #12 extends into Pond #14, as discussed in the full report. The pond is somewhat oval to rectangular in shape with surface measurements of approximately 300 feet (east-west) by 125 feet (north-south).

The pond was probed every 20 feet along the north-south and east-west axes (Figure 4). Table 2 lists the results of the probing and associated information. Probe depths ranged between approximately 3 and 14.5 feet, with a maximum sludge thickness of 6.92 feet and a maximum depth of supernatant of 9.33 feet.

Cross-sectional evaluation indicates the depth of the sludge is greater on the southern and eastern ends of the pond (Figures 5 and 6). This was expected as the overflow pipe from Pond #12 is located at the northeastern corner of the pond. It is likely that this material washed into Pond #14. Based on the field data, the calculated volume of sludge in the pond is approximately 17,591 cubic feet. The volume of supernatant is estimated at approximately 178,530 cubic feet (1,335,403 gallons).

The sludge and supernatant in Pond #14 is noticeably different than that of the other ponds. The supernatant is lighter in color with a weaker odor. The sludge appears to have a much lower solids content, in that it is looser in consistency. Two cores were obtained through the use of a soft sediment coring device. The cores were very difficult to obtain because of the looser consistency of the material. The cores indicate a very fluid sludge near the surface, underlain by a dense layer of material which when broken was dry and flakey inside. When fluid was added to this material, it decomposed readily upon visual inspection. The core extended into the granular material underlying the pond. The sand did not appear to have sludge permeated into it. It is likely that the dense .5 to 1 foot layer of material at the pond bottom is serving as a barrier for seepage into the materials underlying the pond.

TABLE 2

PROBE DEPTHS OF POND #14

Menasha Corporation Otsego, Michigan

(Surface Elevation of Pond: 766.1 feet)

East-West Traverse (beginning at east side, progressing at 20 foot intervals):

Depth to	Supernatant	Thickness	Bottom
Bottom	Depth	of Sludge	Elevation
8.42 feet	4.33 feet	4.09 feet 4.00 4.17 4.58 2.25 3.50 7.25 6.92 3.17 2.00 1.25 0.83 0.83	757.68 feet
9.00	5.00		757.10
9.42	5.25		756.68
9.83	5.25		756.27
8.92	6.67		757.18
9.50	6.00		756.60
13.75	6.50		752.35
14.50	7.58		751.60
11.67	8.50		754.43
7.42	5.42		758.68
7.67	6.42		758.43
7.83	7.00		758.27
5.83	5.00		760.27
4.75	3.50	1.25	761.35
3.00	2.00	1.00	763.10

North-South Traverse (beginning at north end, progressing at 20 foot intervals):

Depth to Bottom	Supernatant Depth	Thickness of Sludge	Bottom Elevation
4.75 feet	4.17 feet	0.58 feet	761.35 feet
7.67	6.00	1.67	758.43
10.50	7.00	3.50	755.60
12.67	9.33	3.34	753.43
9.00	5.17	3.83	757.10

Evaluation of Consistency and Permeability

As discussed in the main report, the recommended alternative for disposal is mixing the sludge with available fly ash and landfilling the material in the on-site landfill. To evaluate the potential affects of this material, two types of evaluation were undertaken; the consistency of the mixtures and the permeability of the sludge/ash mixtures.

On May 31, 1984, sludge samples from Pond #12 and freshly deposited ash at the landfill were obtained. The sludge sample area on Pond #12 was selected to represent a solar-dried sample which would be the result of removing the supernatant from the ponds and a brief drying period. The ash sample was characteristic of all ash materials observed at the landfill.

Since there is a lack of a standardized consistency test available, the evaluation of the sludge/ash mixture was completed through the observation of mixing in the laboratory and drying tests. The sludge and ash were mixed on a weight ratio basis. Five ratios of sludge to ash were selected: 5:1, 4:1, 3:1, 2:1, and 1:1

In the more equal ratios (2:1 and 1:1), the ash volume, due to its lower density, exceeded the sludge volume. It was at these ratios that the material was the most difficult to mix. In association to working in the field with equipment such as bull dozers, mixing would probably not be adequate and results inconsistent. Even though the sludge has a soft, semi-rigid sticky paste texture, it is smooth. As the ash content increases, it still maintains the same textural characteristics but has less voids and is easier to work with until the ash volume exceeds the sludge volume.

In the remaining ratios, the material was easiest to mix as the sludge volume increased. The material still maintained the thick paste appearance but was easier to mix. The confirmation of this was when a 1:1 ratio of the material was combined with a small amount of water. The added water created a combination that was easy to blend.

As shown in Table 3, the ease in mixing is proportional to the moisture content. Since there is not much free water available and the mixtures are relatively impermeable, as discussed later, a more stable mixture would be obtained by bringing the sludge to the landfill, mixing it with ash on-site and then allowing a sufficient drying period.

After samples of the different ratios were dried, two noticable characteristics were observed: 1) the higher the ash content of the sample was, the harder or denser the dried sample was, and 2) the higher the sludge content, the more dessication cracks were present. Both of these were partially a function of moisture content and/or fiber content. The hard, dried state of the mixture represents a surface that would be relatively impermeable.

Since the organic fiber content of the samples is similar to that found in natural lake sediments, some similar properties can be anticipated. As documented in literature, primarily through lake drawdown methods, dried lake sediments do not easily absorb water. Upon drying, the organic sediments form a unique bonding that is not easily dissolved by water contact. Samples of the dried sludge were rewetted and the same characteristics were noted.

In regard to permeability, the sludge/ash mixtures were evaluated through a falling head permeability test. Ratios of 2:1 to 4:1 were selected as they represent the most probable range of mixtures achieved in the field. The results, as listed in Table 3, demonstrate that the material does have some impermeable properties. By simply placing the pure sludge in a screened sieve, the water placed on top does not easily percolate through. Drying the material, though not tested, has the poptential to increase the permeability.

Table 3
PHYSICAL PROPERTIES OF SLUDGE/ASH MIXTURES

Menasha Corporation Otsego, Michigan

Sample Ratio Sludge: Ash (by weight)	Percentage of Sample % Sludge/% Ash (by weight)	Percent Moisture (by weight)	Mixibility w/Sludge	Appearance After Drying	Permeability (cm/sec)
5:1	83.4/16.6	65.28	Good	Volume reduction; pulls away from sides	1.659×10^{-6}
4:1	80/20	61.29	Good	Volume reduction; begins to crack	3.046×10^{-5}
3:1	75/25	59.95	Fair	Reduced volume; cracks; increased density and hardness	1.290 x 10 ⁻⁶
2:1	66.7/33.3	54.25	Poor	Pulls away from sides; some cracking; dense	1.088×10^{-6}
1:1	- 50/50	48.54	Poor	Smoother surface, minimal cracking, very hard	*
!:1 (plus wate	r) 46.5%/46.5% plus 7% water	56.87	Excellent	Reduced volume, heavily cracked, dense	*
Sludge	100% Sludge	72.07	N/A	Extremely reduced volume; heavily cracked	*

N/A - Not Applicable

^{* -} Test Not Run on this Sample.

In summary, the sludge/ash mixtures are not easily mixed when the ash volume exceeds the sludge volume. Mixing is greatly facilitated by the amount of moisture present in the samples. The combination of the two materials creates a very homogeneous mixture that has the texture of wet mortar which is easily worked with. Upon drying, the mixture becomes hard and does not readily absorb moisture. Summary of Sludge/Supernatant Volumes

The following table lists the approximate volume of supernatant and sludge for Menasha Ponds #1, #2, #10, #12 and #14. Volumes are based on field measurements taken on March 20 and May 31, 1984, and are subject to change depending on weather conditions.

Sludge Volume				Supernatant Volume
Pond	Cubic Feet	Cubic Yards	Gallons	(Gallons)
1	04 520	2120 7	622 260	570 724
1	84,528	3130.7	632,269	570,724
2	14,792	547.9	110,940	24,929
10	33,543	1242.3	251,572	37,547
12	227,120	8411.9	1,703,400	30,381
14	17,591	651.5	131,581	1,335,403
TOTALS:	377,574	13,984.3	2,829,762	1,998,984

6/6/84 - 2 40,000 yeb- of fly at available of is d'an let for more g:

Landfill Capacity - Preliminary Calculations

As discussed in the full report, a recommended alternative to pursue included removal and deposition of the sludge into the Menasha-owned, on-site landfill if approved by the MDNR. The material would be mixed with the fly ash currently in the Landfill, as previously discussed. It has been determined that there is in excess of 40,000 cubic yards of fly ash currently in the landfill. Appendix A includes analytical data on the fly ash produced at Menasha.

To further determine the feasibility of this alternative, existing data was reviewed to determine the approximate capacity of the landfill. To facilitate these calculations, several points on the landfill surface were surveyed to determine the existing elevations present.

Utilizing the current closure plan for the landfill, preliminary calculations indicate that there is room for approximately 17,000 cubic yards of material. As previously outlined in this report, there is approximately 14,000 cubic yards of sludge in the five ponds. Additionally, approximately 16,000 cubic yards of cover material will be needed to put a two-foot cap on the landfill.

Two options could be pursued to expand the capacity of the landfill to accommodate the additional material plus the cover. The existing plan could be used and all elevations could be raised by a minimum of two feet; or the final contours could be adjusted so the landfill surface was crowned with drainage ditches or grass waterways located around the perimeter. The latter of these two options would likely result in a higher capacity for the landfill and a more effective surface drainage system. Revision of the existing Closeout Plan could be achieved in a timely fashion for submittal to the MDNR for approval.

Proposed Work Plan

As outlined in the Recommendations section of the main report, the sludge material could be disposed of in the landfill if approved by the MDNR. The plan is basically the same, except for some modifications based on the additional work addressed in this addendum.

Since there is some difficulty in mixing the solar dried sludge with the ash, it is recommended that the sludge be taken from the ponds (after removal of the supernatant) and mixed with the ash prior to drying. The moisture content will not be that much greater than that of the solar dried material. The additional moisture will facilitate the mixing and permit more ash to be mixed in. This will create a more consistent mixture that will be less susceptible to cracking upon drying and will dry to a harder material.

As pointed out, there is more than an adequate amount of ash available for mixing. The ideal range for the sludge/ash ratio is from 2:1 to 4:1. Since the sludge does not easily exude water, there would be no problem in dumping the sludge directly onto the ash, then mixing the materials, and letting the mixture solar dry. Prior to final landfilling, any excess moisture would be readily filtered and absorbed by the ash.

Two diked areas could be created for this mixing. After the materials were combined, one diked area could be permitted to dry while the other one is utilized for the blending process. After a sufficient drying period, the material could be pushed into a landfill area and a new diked area created.

Ash currently being generated could be stockpiled outside of the landfill area to preserve landfill space and supply material for ease in mixing. The only constraints would be that dumping of the sludge into diked areas should not take place on days of heavy rainfall, which could permit excessive percolation or runoff of materials.

Even though there will have to be some modification to the final Close-out Plan of the landfill, the capacity does exist to accept all of the material. Since there is already a monitoring program in operation at the landfill site, any potential negative impacts can be detected. By placing the sludge in the on-site landfill and mixing it with ash, an effective and environmentally-sound method of disposal is achieved.

APPENDIX A

Analysis of Fly Ash



HYDRO RESEARCH SERVICES
Water Management Division
Clow Corporation

408 Auburn Avenue Poritiac, MI 48058 313 334-1630 313 334-4747

9-6-83

MEN00199

Menasha Corporation 320 North Farmer Street Otsego, MI 49078 Att: Mr. Roys

Sample received: 8-12-83

Hydro Number:

6745i

Client I.D.

ASTM D 3987 Leachate Procedure on Ash-8-83

	•
Lead, Pb, mg/l	<0.05
Arsenic, As, mg/l	0.03
Cadmium, Cd, mg/l	<0.01
Selenium, Se, mg/l	· <0.005
Iron, Fe, mg/l	<0.02
Zinc, Zn, mg/l	<0.02
Copper, Cu, mg/l	<0.02
Nitrogen Nitrate, N, mg/l	0.08
Sulfate, SO4, mg/l	290
Chloride, Cl, mg/l	. 2
pН	7.7
Total Chromium, Cr, m.g/l	<0.02
Total Dissolved Solids, mg/l	383

700 grams of solids were leached with 2800 mls of deionized water for 48 hours.

Linda Deans

General Laboratory Manager

Otsego paper mill phasing out old lagoons for new waste-storage plan

BY ROSEMARY PARKER Gazette Correspondent and DALE BETWEE Gazette Staff Writer

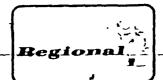
OTSEGO - The Menasha Corp. is spending \$1.5 million to con struct new waste storage facilities that will make 26 open air sludgedrying lagoons at its Otsego pa perboard operation a part of the mill sunlamented past

Big concrete storage tanks and two asphalt lined lagoons to handle the firm's wastewater sludge and pulping chemicals are taking shape. at the northeast corner of Mena sha s complex along the Kalamazoo Rivere here

facility to put it into state of the art condition mill General anymore either Buchanan said Manager Bruce Buchanan told Otsego city commissioners re-

the works include improvements to two lagoons each capable of hold the physical plant and grounds inglia million gallons. The lacoons and improved manufacturing are being constructed with an equipment Menasha has some 225 asphalt bottom to prevent any workers here who turn wood chips into the fluted portion of cardboard About 3k0 tons of the watersupplies fluting roll out of the mill each

source of odor complaints since and that gives is special 1977 when Menasha discontinued wastewater handling problems using sulphut compounds in its process, but they have done little break down the wood fibers called



to beautify the north city land-

The mill manager said that while the new holding tanks will yield Menasha some operational flexibility 'mostly the project accomplishes what I think is the company & social and aesthetic responsibility

"The old, unlined lagoons are This project is a part of a not acceptable from a ground major renovation of our entire water protection standpoint and are not aesthetically acceptable

The new 'tank farm," will consist of three partially buried chanan said concrete storage tanks with a total Buchanan said other projects in capacity of 1 800 000 gallons and liquids from seeping down into the soil and contaminating ground-

Menasha is the only Kalamazonarea papermaker that begins at The old lagnons have not been a the beginning - with wood pulp -

The chemical solution used to

pulping liquor, will continue to be stored after it is 'spent' Bu-

" We incinerate it and then are able to reclaim its basic ingred ent which is sodium carbonate, for reuse Buchanan said

The mill's other waste is the much more familiar sludge or as Buchanan calls it " the dead bug bodies filtered from wastewater

That material must also be stored until it can be hauled in tank trucks to be applied to some of Allegan County's sandier farm

"The sludge is a soil conditioner, expected to take about 18 months improving both the organic con- and cost the company another tent and water retention capabil- \$750,000 Fencing, fill and landits. Buchanan said

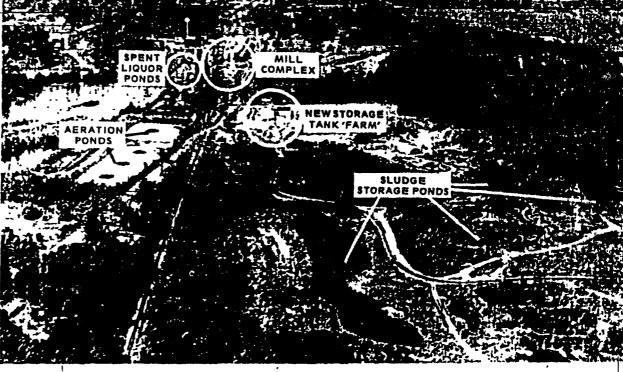
When the new storage complex, now about 40 percent complete is ready, wastes will be pumped into company landfill it directly from the mill through permanent plumbing. Also next year the 'decommissioning' of the old sludge lagoons will begin

Spent liquor from lagoons next to the plant and sludge in old lagoons will be hauled up to the new facility until it can be disposed of permanently Buchanan said

The closing of the old lagoons is order to do so."

scaping of the former lagoons will complete the project, he said. Menasha is also closing an old

Marjorie Spruit, water quality specialist with the Department of Natural Resources' Grand Rapids office, said the Menasha project will yield long term protection of Kalamazoo River water The DNR has encouraged the project, Spruit said Menasha "has undertaken the project voluntarily, there is no Menasha's paperboard division in Otsego is phasing out its long standing sludge-lagoon system. A \$1.5 million project calls for the construction of a trio of huge concrete tanks as well as two new asphaltlined lagoons. The above aerial photograph by the Gazetie's Jerry Campbell shows some of the progress in construction.













STORMWATER PERMIT APPLICATION

DOCUMENT #10

MENASHA CORPORATION Otsego, Michigan

FORM 1, FORM 2F

Storm Water Permit

prepared by:

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

5440 North Cumberland Avenue Suite 111 Chicago, Illinois 60656

Project Nº: 591-6218

September 30, 1992

I hereby certify that this report was prepared under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the State of Illinois.

Pauline M. LeBlanc, P.E. Illinois P.E. #062-041279

Paulum Mr FoBlave





September 30, 1992

Mr. Dave Drullinger
Department of Natural Resources
Surface Water Division
P. O. Box 30038
Lansing, MI 48909

RE: Storm Water Permit - Forms 1 and 2F

Menasha Corporation Otsego, Michigan

Dear Mr. Drullinger

On behalf of Menasha Corporation, enclosed please find the forms required for the Otsego facility to obtain a Storm Water Permit.

Should you have any questions regarding the forms, please do not hesitate to contact our office.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Robert F. Mesec

Senior Staff Scientist

Pauline M. LeBlanc, P.E.

Manager, Environmental Department

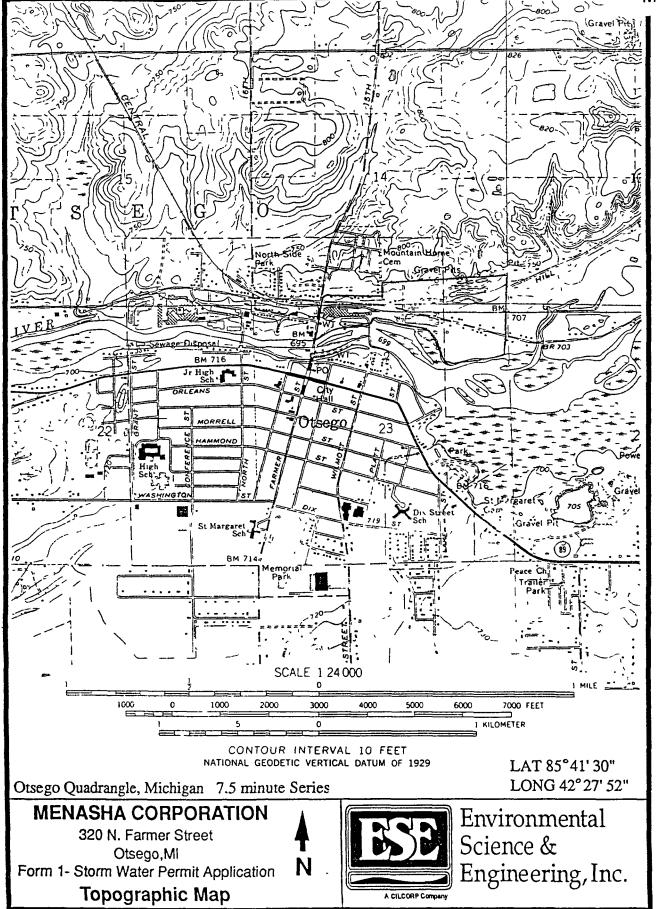
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Approval expires 5-31-92

Form 2F



United States Environmental Protection Agency Washington, DC 20460

Application for Permit To Discharge Stormwate
Discharges Associated with Industrial Activity

MEN00208

Paperwork Reduction Act Notice

Public reporting burden for this application is estimated to average 28.6 hours per application including time for reviewing instructions searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate any other aspect of this collection of information or suggestions for improving this form including suggestions which may increase or reduce this burden to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., SW. Washington, DC 20460, or Director, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

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	85 85 85 85 85 85 85	85 41' 85 41' 85 41' 85 41' 85 41' 85 41' 85 41' 85 41' 85 41' 85 41'	85 41' 33" 85 41' 27" 85 41' 32" 85 41' 32" 85 41' 32" 85 41' 32" 85 41' 31"	85 41' 33" 42 85 41' 30" 42 85 41' 27" 42 85 41' 32" 42 85 41' 32" 42 85 41' 31" 42 85 41' 31" 42	B Latitude C Longitude 85 41' 33" 42 27' 85 41' 30" 42 27' 85 41' 27" 42 27' 85 41' 32" 42 27' 85 41' 32" 42 27' 85 41' 31" 42 27' rmwater discharges are not in on NPDES Permit No. MIOO03824	85 41' 33" 42 27' 42" 85 41' 30" 42 27' 42" 85 41' 27" 42 27' 42" 85 41' 32" 42 27' 42" 85 41' 32" 42 27' 42" 85 41' 31" 42 27' 42" 85 41' 31" 42 27' 42" 10

II. Improvements

A fire you now required by any Federal, State, or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

					Final
identification of Conditions.	2	Affected Outfalls		, Compli	ance Date
Agreements, Etc.	number	source of discharge	3 Brief Description of Project	a req	ים סנסו
····	1				1
N/A		N/A	N/A		-——
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	- -			— 	i
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B You may attach additional sheets describing any additional water pollution (or other environmental projects which may affect your discharges) you now have under way or which you plan Indicate whether each program is now under way or planned, and indicate your actual or planned schedules for construction.

III. Site Drainage Map

Ş

Attach a site map showing topography (or indicating the outline of drainage areas served by the outlall(s) covered in the application is a topographic map is unavailable) depicting the facility including, each of its intake and discharge structures, the drainage area of each size water outlall, paved areas and buildings within the drainage area of each storm water outlall, each known past or present areas used in outdoor storage or disposal of significant materials, each existing structural control measure to reduce pollutants in storm water used erials loading and access areas, areas where pesticides herbicides soil conditioners and fertilizers are applied, each of its haza sizes waste treatment storage or disposal units (including each area not required to have a RCRA permit which is used for accumulating haza sizes waste under 40 CFR 262 34), each well where fluids from the facility are injected underground, springs, and other surface water books are received storm water discharges from the facility.

IV. Narrative Descript				Surfaces (including payed are	eas and building roofs) drained
to the outfall, and an	estimate of the tota	i surface area drained by	the outfall.	Totales (morasmy paves are	eas and odinaring roots) drained
Outfall . Area of Impervio	us Surface	Total Area Drained	Outfall	Area of Impurvious Surface	Total Area Drained
Number (provide u	inita)	(provide units)	Number	(provide units)	(provide units)
REFER TO AT	TO CHMENTI A		1		
MACIAN TO AT	INCIDITAL IN		l i		
<u> </u>			ــــــــــــــــــــــــــــــــــــــ		
a manner to allow ex	posure to storm wi	ater; method of treatment.	, storage, or	disposal; past and present m	n treated, stored or disposed in aterials management practices loading and access areas; and
the location manner	and frequency in v	vhich pesticides, herbicide	s, soil condi	tioners, and fertilizers are appl	red.
REFER TO AT	TACHMENT A				
			•		
				i	
		,			e de la companya de
C. For each outfall, pro	vide the location a	nd a description of existing	ng structural	and nonstructural control me	easures to reduce polititants in
storm water runoff; a	ind a description of		vater receive:	s, including the schedule and	type of maintenance for control
Outfall					List Codes from
lumber	·	Treatmen	nt		Table 2F-1
REFER TO AT	TACHMENT A		•		
nonstormwater disch	alty of law that the	ne outfail(s) covered by			evaluated for the presence of the an accompanying Form 20
or Form 2E application ame and Official Title (type)	on for the outfall.	Signature			Date Signed
	UPERVISOR	Kei	11/1	3 Kling	9/28/92
B. Provide a description	of the method use	d the date of any testion	and the onsi	te drainage points (hat were d	irectly observed during a test
5 FIOVIDE & CESCIPHON	TOT the method dae	d. till date of Erry resting.		V	
NON STORMWAY	TER DISCHARG	SES ARE INCLUDED	IN NPD	ES PERMIT NO. MI00	003824
	•				
VI. Significant Leaks	or Spills				
				toxic or hazardous pollutants and amount of material relea	s at the facility in the last three
years, including the appr	Oximate date and it	cation of the spin of leak,	and the type	, and amount of material feres	
		SPILLS OF TOXI		ZARDOUS POLLUTANTS ARS	S HAVE
A TOTAL LOS PROCESS TAN OF NATURAL	S OF APPROXI KS WAS REPOR RESOURCES IN	MATELY 5,000 GA TED TO MR. GENE I SEPTEMBER OF 1	LLONS O MOGG O	F WHITEWATER FROM F THE MICHIGAN DEF EFER TO A PROGRESS	
KEPUKI SUBM	TTED TO THE	MICHIGAN DEPT.	OF NAIL	UKAL KESOURCES.	

A.B.C. & D: See instructions before proceeding.	Complete one set of tables for each out		or in the space p	
Potential discharges not covered by analys	is - Is any pollutant listed in Table 2F-2		of a substance whi	ch you
currently use or manufacture as an intermed	iaté or final product or byproduct?	רבו	•	
Yes (list all such pollutants below)		12 No	(go to Section IX) .	·
	shared poliurants below) All Toxicity Testing Data Ist all such poliurants below) All Toxicity Testing Data Ist all such poliurants below) All Toxicity Testing Data Ist all such poliurants below) All Toxicity Testing Data Ist all such poliurants below) Ist all such poliurants and belognone number of, and poliurants Interest and such abordance of time below) A Name Ist all such poliurants and belognone number of, and poliurants Interest and such abordance of time below) A Name Ist all such poliurants and belognone number of, and poliurants Interest and such abordance of time below) A Name Ist all such poliurants and belognone number of, and poliurants Interest and such abordance of time below) Ist all such poliurants and telephone number of, and poliurants and telephone number of, and poliurants and the number of the poliur			
A QUARTERLY TOXICITY TEST IS CURRENTLY BEING CONDUCTED ON THE FACILITIES WASTEWATER. ACUTE, DEFINITIVE TESTS ARE CONDUCTED USING FATHEAD MINNOWS AND DAPHNIA MAGNA. THE TESTS ARE 96-HOUR IN DURATION FOR THE FATHEAD MINNOWS AND 48-HOUR-IN DURATION FOR D. MAGNA. NONE OF THE TESTS RESULTED IN SIGNIFICANT MORTALITY TO THE ORGANISMS. NO TOXICITY TESTING HAS BEEN PERFORMED ON STORMWATER DISCHARGES. **Contract Analysis Information** Were any of the analyses reported in them V performed by a contract laboratory or consulting firm? X Yes (list the name, address, and telephone number of, and pollutants analyzed by each such laboratory or firm below) A Name B. Address C. Area Code & Phone No. D. Pollutants Analyzed ENVIRONMENTAL SCIENCE & 8901 INDUSTRIAL ROAD (309) 692-4422 OIL & GREASE PH, BOD, COD,				
Do you have any knowledge or reason to believe on a receiving water in relation to your discharge	that any biological test for acute or chri- within the last 3 years?	onic toxicity has been made or	n any of your dischar	iõez ol
Yes (list all such pollutants below)		X No.	(go to Section IX)	
A QUARTERLY TOXICITY TES	T IS CURRENTLY BEING CON	DUCTED ON THE EACH	T TMTDA	
WASTEWATER. ACUTE, DEFI	NITIVE TESTS ARE CONDUCT	ED USING FATHEAD M	TNNOWS	
AND DAPHNIA MAGNA. THE T	ESTS ARE 96-HOUR IN DURA	TION FOR THE FATHE	AD	
	•			٠.
			MS.	
NO TOXICITY TESTING HAS	BEEN PERFORMED ON STORMW	ATER DISCUADORS		
		AILK DISCHARGES.		
ASIC, & O. See instructions below proceeding. Complete one set of tables for each outfall. Annotate the outfall number in the space in Tables VIA. ViiB. and ViiC. are included on separate sneets numbered VIII. and VIII. 2 and VIII. 3 and VIII. 4 and VIII. 3 and VIII. 4 and VIII. 3 and VIII. 4				
Contract Analysis Information		and the state of t	eg er og a tilste	n system
(. Contract Analysis Information Were any of the analyses reported in Item V perfe	ormed by a contract laboratory or consul	ting firm?		
K. Contract Analysis Information Were any of the analyses reported in Item V performance. X Yes (list the name, address, and tells)	ormed by a contract laboratory or consul	ting firm?		
X. Contract Analysis Information Were any of the analyses reported in Item V performance. X. Yes (list the name, address, and tell analyzed by, each such laboratory A. Name	ormed by a contract laboratory or consultation of and pollutants or firm below)	ting firm?	(go to Section X) D Pollutants An	alyzed
X. Contract Analysis Information Were any of the analyses reported in item V perfection X Yes (list the name, address, and telegraphy each such laboratory A. Name ENVIRONMENTAL SCIENCE &	permed by a contract laboratory or consult options number of, and pollutants or firm below) B. Address 8901 INDUSTRIAL ROAD	ting firm? No C. Area Code & Phone No.	(go to Section X) D Pollutants An OIL & GREAS	alyzed SE
X. Contract Analysis Information Were any of the analyses reported in item V perfection X Yes (list the name, address, and telegraphy each such laboratory A. Name ENVIRONMENTAL SCIENCE &	permed by a contract laboratory or consult options number of, and pollutants or firm below) B. Address 8901 INDUSTRIAL ROAD	ting firm? No C. Area Code & Phone No.	(go to Section X) D Pollutants An OIL & GREAS PH, BOD, CO	alyzed SE
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X. Contract Analysis Information Were any of the analyses reported in item V perfect X Yes (list the name, address, and telegraphy analyzed by, each such laboratory A. Name ENVIRONMENTAL SCIENCE &	permed by a contract laboratory or consult options number of, and pollutants or firm below) B. Address 8901 INDUSTRIAL ROAD	ting firm? No C. Area Code & Phone No.	(go to Section X) D Pollutants An OIL & GREAS PH, BOD, CO TSS, TKN, NITRATE, NI TPHOSPHOROU	alyzed SE OD, ITRITI
X. Contract Analysis Information Were any of the analyses reported in item V perfection X Yes (list the name, address, and telegraphy each such laboratory A. Name ENVIRONMENTAL SCIENCE &	permed by a contract laboratory or consult options number of, and pollutants or firm below) B. Address 8901 INDUSTRIAL ROAD	ting firm? No C. Area Code & Phone No.	OPOSITION X) D POSITION X) OIL & GREAS PH, BOD, CO TSS, TKN, NITRATE, NI TPHOSPHOROUS PHOSPHOROUS	alyzed SE DD, ITRITI US, IHO-
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X Yes (list the name, address, and tele analyzed by, each such laboratory A. Name ENVIRONMENTAL SCIENCE &	2. See instructions before proceeding. Complete one set of tables for each outfall Amortase the outfall number in the space Tables VILA VIB.8 and VIC.2 are included on separate sheets numbered VIEL and VID.2 and discharges not convered by analysis is any pollutant listed in Table 2F-2 a substance or a component of a substance which you give or manufacture as an intermediate or first product or byproduct? [X] No (go to Section 10) [X] No (go to			
Contract Analysis information Vere any of the analyses reported in item V performance X Yes (list the name, address, and telegraphy each such laboration A. Name ENVIRONMENTAL SCIENCE & ENGINEERING, INC.	ephone number of, and pollutants or firm below) B. Address 8901 INDUSTRIAL ROAD PEORIA, IL 61615	C. Area Code & Phone No. (309) 692-4422	D Pollutants An OIL & GREAS PH, BOD, COTSS, TKN, NITRATE, NITPHOSPHOROUS SOLUBLE ORT PHOSPHOROUS TOTAL ZINC, COPPER	alyzed SE DD, ITRIT: US, IHO- S,
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X. Certification I certify under penalty of law that supervision in accordance with a systhe information.	primed by a contract laboratory or consult or firm below) 8 Address 8901 INDUSTRIAL ROAD PEORIA, IL 61615 this document and all attachment of the person or person	C. Area Code & Phone No. (309) 692-4422 The ents were prepared unalified personnel propersons who manage the systems.	D Pollutants An OIL & GREAS PH, BOD, CO TSS, TKN, NITRATE, NI TPHOSPHOROUS PHOSPHOROUS TOTAL ZINC, COPPER	alyzed SE OD, ITRITI US, IHO- S, on or raluate ersons
A. Contract Analysis Information Were any of the analyses reported in item V performance of the analyses reported in item V performance of the analysed by each such laboration. A. Name ENVIRONMENTAL SCIENCE & ENGINEERING, INC. X. Certification I certify under penalty of law that supervision in accordance with a systhe information submitted. Based on directly responsible for gathering the	primed by a contract laboratory or consult or firm below) 8 Address 8901 INDUSTRIAL ROAD PEORIA, IL 61615 this document and all attachments and designed to assure that query inquiry of the person or persections and information stem of the information of the person or persections.	c. Area Code & Phone No. (309) 692–4422 The ents were prepared unalified personnel propersons who manage the systemitted is, to the best	D Pollutants An OIL & GREAS PH, BOD, CO TSS, TKN, NITRATE, NI TPHOSPHOROUS TOTAL ZINC, COPPER Inder my directify gather and evication or those per of my knowledge	alyzed SE OD, ITRITI US, ITHO- S, on or raluate ersons ee and
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Form Acoroved CMB No 2040 Approval expires

MEN00211

TFALL A

Discharge Information (Continued from page 3 of Form 2F)

Part.A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each purfail. See instructions for additional details.

	Maximi	um Values	Average	Values	Number	
Pollutant	(inclu	de units)	(includ	e units)	of	•
and CAS Number (if available)	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Pollutants
Oil and Grease	14 ^{mg} /L	_			1	
logical Oxygen emand (BOD5)	32 ^{mg} /L	$26^{mg}/L$			1	
hemical Oxygen mand (COD)	178 ^{mg} /L	170 ^{mg} /L			1	
al Suspended Solids (TSS)	128 ^{mg} /L	63 ^{mg} /L			1	
rogen	2.08 ^{mg} /L	2.23 ^{mg} /L		<u> </u>	1	
	1.07 ^{mg} /L	0.86 ^{mg} /L			1	
tal Josephorus .	0.51 ^{mg} /L	0.49 ^{mg} /L			1	
	Minimum C CC	Maria	Minimum	Maximim		

H Minimum 6.66 Maximum Minimum Maximum

Part 8 - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPCES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall See the instructions for additional details and requirements.

Seet	he instructions for ad	ditional details and r	equirements.	······································			
1		m Values	Average	Values	Number		7
Pollutant	(includ	• units)		e units)	of		1
and	Grab Sample		Grab Sample		Storm		ĺ
Number	Taken During First 30	Flow-weighted	Taken During First 30	Flow-weighted	Events		ł
, available)	Minutes	Composite	Minutes	Composite	Sampled	Sources of pollutants	ł
. COPPER	0.010 ^{mg} /L	0.010mg/r.			7 1		7
. ZINC	0.264 ^{mg} /I,	0.167 ^{mg} /L			ī		
T. ORTHO-	0.22mg/L	0.20 ^{mg} /L			1 7 1		
PHOSPHOR							
ESIDUAL.CI		_			-		7
I. PHOSPHOR	OUS 0.51mg/I	0.49mg/L			1		
BOD	32 ^{mg} /L	26mg/L			1 1		
SS	128 ^{mg} /L	63mg/L					
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MEN00212

ITFALL B

Discharge Information (Continued from page 3 of Form 2F)

You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each putfall. See instructions for additional details.

1	Maxim	um Values	Average	e Values	Number	
Pollutant	(inclu	de units)	(includ	e units)	of	
and "AS Number if available)	Grab Sample Taken Dunng First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Pollutants
il and Grease	lmg/L	_			1 1	
ogical Oxygen	lmg/L	8 ^{mg} /L			1	
hemical Oxygen Trand (COD)	ll ^{mg} /L	136 ^{mg} /L			1	
al Suspended olids (TSS)	18 ^{mg} /L	54 ^{mg} /L			1	
्या Kjeldahl ogen	0.49 ^{mg} /L	0.55 ^{mg} /L			1	
litrate plus litrite Nitrogen	0.08mg/L	0.26 ^{mg} /L		•	i	
al esphorus	0.18 ^{mg} /L	0.74 ^{mg} /L			1	
н :	Minimum 7.69	Maximum	Mìnimum	-Maximum		

Minimum 7.69 Maximum art 6 - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPCES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall See the instructions for additional details and requirements.

	•	Average	Values	Number		\neg
	llutant	(include	units)	of		1
	and	Grab Sample Taken During		Storm		
weighted	Rumber	First 30	Flow-weighted	Events		l
nposite	(allable)	Minutes	Composite	Sampled	Sources of Portutants	
Omg/L	PPER]		
9mg/L	NC			<u> </u>		
mg/L	RTHO-			1 1 1	······································	
	OSPHOROU					
	DUAL.CI					
mg/L	оѕрнокфи			<u> </u>		
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MEN00213

TFALL C

Yobunal explas 2-21-45

Discharge Information (Continued from page 3 of Form 2F)

You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outlail. See instructions for additional details.

	Maximu	m Values	Average	e Values	Number	
Pollutant	(includ	le units)	(includ	e units)	of	
and CAS Number (if available)	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Storm Events Sampled	Sources of Pollutants
and Grease	$4^{mg}/L$	_	:		1	-
logical Oxygen Demand (BOD5)	52 ^{mg} /L	49 ^{mg} /L			1	
mand (COD)	476 ^{mg} /L	280 ^{mg} /L			1	
otal Suspended Alids (TSS)	168mg/L	40 ^{mg} /L			1	
al Kjeldahl Arogen	5.41 ^{mg} /L	2.93 ^{mg} /L			1	
litrate plus Prite Nitrogen	1.34 ^{mg} /L	0.96 ^{mg} /L			l	
tal Phosphorus	0.96т9	0.93 ^{mg} /L			1.	

Minimum 6.80 Maximum Minimum Maximum

Part B - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPCES permit for its process wastewater (if the facility is operating under an existing NPOES permit). Complete one table for each outfall See the instructions for additional details and requirements.

See the		ditional details and f					4
1	Maximun	n Values	Averag	e Values	Number		1
Pollutant	(include	units)	(includ	le units)	of		l
and	Grab Sample Taken During First 30	Flow-weighted	Grab Sample Taken During First 30	Flow-weighted	Storm Events		
(if available)	Minutes	Composite	Minutes	Composite	Sampled	Sources of Poliutants	ł
. COPPER	0.010 ^{mg} /L	0.010mg/L			111		1
ZINC	0.177 ^{mg} /L				1		1
ORTHO-	0.44 ^{mg} /L	0.52 ^{mg} /L			i 1		1
PHOSPHOR	DUS			 			1
ESIDUAL CI				 	1		1
. РНОЅРНОК	US 0.96mg/L	0.93 ^{mg} /L		 	1		1
OD (52 ^{mg} /L	49 ^{mg} /L		<u> </u>	1 1		1
SS	168mg/L	40 ^{mg} /L		 	1 7		1
		30 3/11		 	 		1
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Part C - Ust each pollutant shown in Tables 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements, Complete one table for each outfall.

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^{9.} Provide a description of the method of flow measurement or estimate.

OUTFALL A & C - Flow rate was estimated by measuring velocity & flow depth approximatel every 20 minutes & converting flow depth to cross-sectional area of flow based on the diamensions of the conveyance

288 hours

OUTFALL B

- Flow rate was estimated using the Santa Barbara Runoff Hydrograph Method which calculates the runoff depth throughout the storm event based on cumulative rainfall and surface characteristics of the drainage basin and then converts depth to runoff rates

ft. per sec. cubic ft.

ATTACHMENT A

Menasha Corporation
Otsego, Michigan
Stormwater Permit Application
Form 2F

SECTION IVA

Area of Impervious Surface	Total Area Drained
68,906 sq.ft.	68,906 sq.ft.
151,875 sq.ft.	151,875 sq.ft.
18,675,000 sq.ft.	19,125,000 sq.ft.
12,276 sq. ft.	12,276 sq.ft.
8,649 sq.ft.	8,649 sq.ft.
	25,200 sq.ft.
134,550	134,550
	68,906 sq.ft. 151,875 sq.ft. 18,675,000 sq.ft. 12,276 sq. ft. 8,649 sq.ft.

SECTION IVB

Description of Significant Materials

The following are significant materials stored outside at this facility.

Raw Materials

Various solvents are stored in drums located in a covered non-flammable chemical storage structure located north of the plant in the chip yard area. The storage building has a sloped floor with its own drainage system. This area does not discharge into any surface water body. All drainage is drummed and disposed of properly. Solvents consist mostly of:

Isopar-m Naphtha-360

Outdoor storage of wood chips and wastepaper (stored in area drained by Outfall C)

Outdoor storage of coal (stored in area drained by Outfall B)

Waste Materials

Spent cooking liquor tank farm located at north east portion of PROPERTY (stored in area drained by Outfall C). The tank farm is located in a cement vault, that prevents contact with stormwater runoff.

92082804 ATT

Attachment A

Page 2

Organic sludge is located adjacent to spent cooking liquor tank farm at northeast portion of PROPERTY (stored in area drained by Outfall C). The sludge lagoons have sloped walls that prevent stormwater runoff.

Other

Above ground storage tank containing fuel oil is located in the chip yard area (stored in area drained by Outfall C).

Soda ash and SLI product tanks are located on the north side of the plant (stored in area that drains to the treatment plant).

Soda ash loading/hauling area located on south side of plant (stored in area that drains to the treatment plant).

Landfill area consists of approximately 78 acres located at the northeast area. This area has its own drainage catch basin which does not discharge into any surface water body.

Pesticides, herbicides, fertilizers and soil conditioners are not used at this facility.

NPDES permit # MI0003824 discharges directly to the Kalamazoo River. The non-stormwater discharge does not use any of the outfalls listed in Section 1. The permit consists of: Non-contact cooling water, treated vacuum pump seal water, heat exchanger shower water, condensate, treated process wastewater, lime slurry, misc. seal and cooling water, recovery evaporates condensate, boiler blow down, zeolite recharging wastewater, roof, floor drain, turbine condenses water. (not represented in stormwater sampling)

SECTION IV C

à

SCS

Structural controls used at the facility include reduction of outdoor storage areas, reduction of outside maintenance areas, and inside storage of solvents.

Non-structural controls include employee training, spill reporting and clean-up and good housekeeping techniques.

Outfall A is located at the Southwest corner of the property along the Kalamazoo River. This drainage point covers areas such as the warehouse truck dock, employee parking lot, and roof drainage. The stormwater runs off the PROPERTY through four (4) catch basins which tie together and drain directly to the Kalamazoo River.

Attachment A
Page 3

Outfall B is located at the South portion of the PROPERTY along the Kalamazoo River. This drainage point covers areas such as the coal storage area, power house activity, soda ash loading/hauling and roof drainage. The stormwater runs off the property though one (1) catch basin which discharges directly to the Kalamazoo River near the dam.

Outfall C is located at the Southeast portion of the PROPERTY along the Kalamazoo River. This drainage point covers area such as raw materials storage and handling, waste material storage, and handling, fuel oil tank, railroad tracks, and coal storage area. The stormwater runs off the PROPERTY through a series of catch basins, located north of River Road stormwater flows through a ditch at the waste material storage area and tie in with the catch basin, and discharges directly to the Kalamazoo River.

The remaining drainage points, on the PROPERTY, consists of the north side of the plant which mostly drains the rail car loading area. This area connects with the municipal storm sewer on Farmer Street. This area does not have an excessible sampling point.

Outfall 001 and 002 are located on the Southwest portion of the PROPERTY and discharges directly to the Kalamazoo River. Both outfalls drain the employee parking lot. This area was not sampled but can be represented by the sampling of Outfall A.

Outfall 003 is located on the South portion of the PROPERTY, along the Kalamazoo River. This outfall has poor drainage, on an all dirt surface area. This area consists of sheet flow with small roof drainage. This area was not sampled but can be represented by the sampling of Outfall B.

PAPERBOARD DIVISION

AVAN - ENGEHA CORPORATION

August 17, 1994

Lisa Harry
MDNR Surface Water Quality Division
Plainwell District Office
621 North Tenth Street
PO Box 355
Plainwell, MI 49080

Dear Ms. Harry:

Please find enclosed a completed NOTICE OF INTENT form for coverage of storm water discharges associated with our facility. Page 2 of this form indicates that an individual stormwater application was previously submitted. This was done in February, 1990. A copy of the MDNR acknowledgement letter is attached.

Please notify me when training courses are being offered by MDNR so we can begin preparation of our Storm Water Pollution Prevention Plan.

If you have any questions concerning this application, please contact me at 616/692-6141.

Sincerely,

Keith Kling

Environmental Supervisor

BUX B. Buy

KK:nam

Enclosures (2)

cc: John Bonham

David Merkel

Al Switzenberg

Len Myers

Pete DeRossi

NOTICE OF INTENT for coverage under National Pollutant Discharge Elimination System (NPDES)

GENERAL PERMIT

Storm Water Discharges Associated with Industrial Activity By Authority of Act 245, P A. 1929 as amended

Submission of this Notice of Intent (NOI) constitutes notice that the party identified in Section I.A. of this form requests authorization to discharge under NPDES General Permit No. MIR000000 issued for storm water discharges associated with industrial activity in Michigan. The Michigan Department of Natural Resources may deny coverage under-this general permit and require submittal of USEPA application forms 1 and 2F for an individual permit or an application to be covered under an alternative general permit. Becoming a permittee obligates a discharger to comply with the terms and conditions of the general permit. Failure to comply with these provisions may result in fines of up to \$25,000 per day and the possibility of imprisonment, in accordance with Act 245.

ALL NECESSARY INFORMATION MUST BE PROVIDED ON THIS FORM.

Print or type in the spaces provided. Attach extra sheets of pap	er, it needed, clearly indicating which section you are addressing.				
I. PERMITTEE/SIT	E INFORMATION				
name, leave this space blank. B. Primary Standard Industrial Classification (SIC) Code: To do Manual recommends using a value of receipts or and plastic products, the facility would total receipt revenue for the facility indicates the operation in a certification. C. Facility Name & Address: Give the name and address of the activity occurs. D. Contact Person, Mailing Address & Telephone #: Give the in case questions and/or problems arise from this. E. Facility Location: Identify the proper location of the center section, township, range, and county. F. Receiving Waters: Name the water(s) that directly receive	name, mailing address, and telephone number of the person to contact form or the general permit. of the facility in terms of quarter-quarter section, quarter section, storm water runoff from the site. If the discharge flows through a loperator of the municipal separate storm sewer system and the				
A. PARENT COMPANY, DIVISION & OWNER: 18 PRIMARY STANDARD INDUSTRIAL CLASSIFICATION(SIC) CODE: Use 4 digits: 26 3 1 164 = Gergstrom RQ. Neenach Wi.					
C. FACILITY NAME & ADDRESS. Michaela Corporation Faporboard Division 320 N. Farmer St. OTERAO. Ml. 49073	D. CONTACT PERSON, MAILING ADDRESS & TELEPHONE #. Keitl C. Kling - Env Superissor 320 N FARMUR 37. OTSeud Mil. 49073 6/6/6/32-6/4/ Ex 406				
E. FACILITY LOCATION: NE 1,4 N W1/4 Section 23, Town O/N. Range, 12 W County: Allegan	F. RECEIVING WATERS: Kalanazoo River OWNER/OPERATOR OF MUNICIPAL SEPARATE STORM SEWER SYSTEM: W.A.				
DNR USE ONLY - DO NOT WRITE IN SHADED AREA NPDES PERMIT NUMBER: DESIGNATED NAME:					

BASIN CODE:

BASIN YEAR:

MEN00220

URAL RESOURCES COMMISSION
FINANCIA DE SUPER
GORDON E GUYER
KERRY KAMMER
ELLWOOD A MATTSON
O STEWART M'ERS
RAYMOND POUPORE

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THE HEAT

DEPARTMENT OF NATURAL RESOURCES

FOUNDATIONS OF BUILDING POLICE SOLUTIONS OF STREET

DAVID E HALES Diviers

May 25, 1990

Mr. James B. Porter Menasha Corp, Paperboard Group 320 N. Farmer St. Otsego, MI 49078-0155

Dear Mr. Porter:

SUBJECT: Stormwater Permit Submittal

We have received your submittal dated February 6, 1990, pursuant to Section 402(p) of the Federal Clean Water Act, which required the filing of stormwater applications by February 4, 1990. The U.S. Environmental Protection Agency (EPA) has not yet finalized the stormwater permitting regulations required under the Clean Water Act.

If it is determined that a permit is needed to establish necessary controls, we will process your application. Otherwise, your submittal will be maintained on file until the federal regulations have been finalized and application forms are available. The information in your file will be reviewed to determine if you will need to fill out a new form, or update your previous submittal. We will advise you of any additional requirements at that time.

If you have any questions, please contact me.

Sincerely,

Gary Boersen Permits Section

Surface Water Quality Division

517-373-1982

cc: SWQD District Office

PERMIT NO. MIROOOOO



MICHIGAN DEPARTMENT OF NATURAL RESOURCES AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et seq; the "Act"), and Michigan Act 245, Public Acts of 1929, as amended, (the "Michigan Act"), storm water associated with industrial activity, as defined under 40 CFR 122.26(b)(14)(i-ix) and (xi), or as deemed necessary under Section 402(p)(2)(E) of the Act, is authorized to be discharged from facilities in accordance with conditions set forth in this general permit.

The applicability of this general permit shall be limited to point source discharges of storm water (and non-storm water identified in Section I.C.3.b. of this general permit) which discharge either directly or via a storm sewer system to surface waters of the State, and which have not been determined by the Michigan Department of Natural Resources to need individual permits.

This permit is valid authorization to discharge only if accompanied by a Certificate of Coverage issued for an individual facility by the Michigan Department of Natural Resources.

This permit may authorize storm water discharges associated with industrial activity that are mixed with storm water discharges associated with construction activities provided that the storm water discharge from the construction activity is in compliance with Rule 2190 of the Part 21 Rules of the Michigan Act.

The terms and conditions of this general permit shall apply to an individual facility and shall take effect on the date of issuance of a Certificate of Coverage for the facility. The Michigan Commission of Natural Resources may grant a contested case hearing on this general permit in accordance with Section 8(3) of the Michigan Act. Also, the Michigan Commission of Natural Resources may grant a contested case hearing on the Certificate of Coverage issued to an individual facility under this general permit in accordance with R 323.2192(c) of the General Rules of the Michigan Act.

This general permit shall expire at midnight January 31, 1999.

Issued February 15, 1994

Deputy Director for Environmental Projection

WEIR CONSOLIDATION PROJECT

		May 31, 1990 - July 31, 1991	August 1, 1991 - End of Permit
BOD 5	1 Day Maximum	7,833 #/day	10,008 #/day
	Monthly Average	3,889 #/day	4,962 #/day
TSS	1 Day Maximum	11,000 #/day	14,328 #/day
	Monthly Average	5,500 #/day	7,164 #/day

III. Modifications To Waste Treatment System

Pilot plant studies are in progress to understand the impact which the mill expansion will have on the waste treatment system's ability to meet all permitted effluent discharge limitations. Until the pilot plant studies are complete and all data analyzed, and the final permit limitations have been issued, it is not possible to determine with certainty what system changes if any, will be necessary. If it is determined that system changes are required, Menasha Corporation will submit construction permits for approval as required prior to commencing work.

IV. Weir Consolidation

The mill currently discharges to the Kalamazoo River through five permitted outfalls, as follows:

Outfall	Description	Maximum Flow
001	Noncontact cooling water	600,000 gpd
002	Vacuum pump seal water, heat exchanger cooling water and other noncontact cooling water	800,000 gpd
003	Treated process wastewater from outfall 000	920,000 gpd
003 & 005	Turbine condensor water	6,955,000 gpd
004	Noncontact cooling water, boiler blowdown, zeolite recharging wastewater, roof drains	234,000 gpd

Page 5

Menasha proposes no changes to outfall 001. To simplify monitoring and reporting, however, it is proposed that all of the remaining outfalls be combined prior to discharge into one outfall. A diagram of this proposal is attached and labeled Figure 1. A single monitoring and sampling station will be built to sample the effluent after flows from 000, 002, and 004 are combined, but before the turbine condensor water is added.

Under the current permit, although outfalls 000 and 002 are monitored individually, the resultant BOD 5 and TSS results are summed for purposes of the permit's effluent limitations. By combining these two flows into one outfall, the same result is achieved with less measuring and reporting necessary. Outfall 004 is virtually free of BOD 5 and TSS, and monitored by means of a weekly grab sample. In this combined scenario, any contribution it does make to BOD 5 and TSS is accounted for.

The turbine condensor water will be diverted into the common outfall downstream of the monitoring station. This will reduce the number of permitted outfalls to two; 001 and 003.

Due to the time involved in engineering design, funding approval, and construction, it is difficult to establish an exact date when this weir consolidation can occur. Therefore, Menasha Corporation proposes the following schedule for purposes of this permit renewal. The weir consolidation will be completed sometime after the new NPDES permit is issued on May 31, 1990, but no later than July 31, 1991 when the capital expansion will be completed. Until such time as the weir consolidation is complete, the new permit limits on BOD 5 and TSS will be applied to the sum of the measured results on outfalls 000 and 002. This is the same method used in the current permit. Outfall 004 will continue to be limited and monitored as per the provisions of the current permit.

Menasha Corporation will notify the MDNR in writing at least two months prior to the date that the weir consolidation is executed. Once the weir consolidation is complete, the applicable BOD 5 and TSS limits will remain the same, but will be applied against one measurement from the combined outfall.

V. Total Flows

As outlined above, the total allowable combined flow from outfalls 000, 002, and 004 under the existing permit is 1,954,000 gallons per day. Due to continued production increases and the planned 1991 expansion, this is no longer adequate to meet the mill's needs. Menasha Corporation is requesting that this flow limit be increased to 3,000,000 gallons per day. This new flow limit would go into effect concurrently with the weir consolidation, which would be no later than July 31, 1991. Until

KBK

MEN00226

PAPERBOARD DIVISION

'AVA' MENASHA CORPOPATION.

May 3, 1991

Mr. Gene Mogg Michigan Dept. of Natural Resources 621 10th Street Plainwell, MI 49080

Dear Gene,

In accordance with the requirements of Permit #MI0003824, Part I. C. 3. a. I am submitting basic design parameters and plans for upgrading our waste treatment facility for your review.

Under current operating conditions our system receives a BOD loading of approximately 24,000 Lb/day with a daily water flow of 0.7 million gpd. TSS to the system averages 5000 Lb/day. After completion of our mill upgrade, BOD will increase to 28,000 Lb/day, flow will increase to 1.4 million gpd and TSS should remain about 5000 Lb/day.

Pilot Plant studies indicate that a 60 ft. clarifier will be required to provide adequate solids removal under the anticipated loading and operating conditions. The study also indicated that addition of four aerators will provide adequate oxygen for all but the most severe short term loadings. Our experience has shown that these short term drops in 0_2 do not create significant problems for our operation.

The basic plans were described in writing when we submitted our Surface Water Application in September 1990. Further information was submitted on February 26, 1991 and March 19, 1991 as engineering data was developed. With the information presently available I feel I can give a clear layout for the proposed system modifications.

There will be two elements to our waste treatment modification. They will be constructed concurrently with both parts scheduled to be functional by August 30, 1991.

The major modification is expansion of the wastewater treatment capacity. This will include four main components.

• Installation of a second wastewater line from the mill to the aerated lagoon. The new line will run parallel to the existing wastewater line. The route is shown on drawing DM-83-471. The pipe will be 8" ductile iron with a concrete liner. This is the same material from which the existing line is constructed.

1-616-692-2060 (Fax)

Page 2 KBK - Mogg

- Four additional aerators will be added to the aerated lagoon. These aerators will be installed to work in conjunction with the existing five aerators. Although the specific supplier has not been selected at this time, the aerators to be purchased will be high speed, 75hp units. The oxygen exchange from the aerators will be capable of transferring at least 2.9 pounds of oxygen per horse power per hour.
- A 60 foot Eimco clarifier will be installed to handle the increased hydraulic flow to the system. The clarifier will be installed directly north of the existing clarifier within the present confines of our East Settling Pond. We have decided on a complete closure of this pond. All organic materials will be removed down to clean soil. Sludge removed from this pond will be applied to our approved sites in accordance with our permit. A copy of the preliminary clarifier plans have been included for your review.
- A new discharge line from 000 Weir to 00B Weir will be installed to handle the increased water flow. The routing of this line is shown on drawing #DM-83-471.

The second part of the waste treatment modification is consolidation of our existing weirs. The specific elements of the weir consolidation will be:

- Installation of tanks, pumps, and piping within the mill to redirect 002 wastewater to the East end of the mill.
- Installation of a magnetic flow meter and flow totalizer in the 002 discharge line.
- Construction of a new weir building (00B) which will consolidate and monitor the flows from 000, 002, and 004 outfalls. The new weir building is presently being designed.
- Cutover of piping from 000 and 004 discharges to 00B.
- Demolition of 002 aeration pond and building.

Preliminary groundwork on this project will begin on May 6 with expected project completion by August 30, 1991.

If you have any questions or concerns, please call the writer or John Bonham at 692-6141.

Page 3 KBK - Mogg

Sincerely,

Otsego Paperboard Division

Keith B. Kling Environmental Supervisor

Enclosure

John Bonham cc:

> Pete DeRossi John Blauwkamp

KBK:amc



NATURAL RESOURCES COMMISSION
MARLENE J FLUHARTY
'ORDON E GUYER
STEWART MYERS
HAYMOND POUPORE

JOHN ENGLER Governor

DEPARTMENT OF NATURAL RESOURCES

DELBERT RECTOR, Director

District 12 Headquarters
P.O. Box 355, Plainwell, Michigan 49080

June 4, 1991

Mr. Keith B. Kling Menasha Corporation Paperboard Division 320 N. Farmer Otsego, Michigan 49078-0155

Dear Mr. Kling:

SUBJECT: Proposed Wastewater Treatment Facility Modifications

We have completed our review of the plans and basis of design information provided with your May 3, 1991 letter to Mr. Gene Mogg. The information provided in this submittal, in conjunction with the performance of the existing treatment facility, indicates that the proposed facilities should be capable of meeting the limitations listed in Menasha's NPDES permit. The proposed modifications are therefore approved.

Please contact this office if you have any questions regarding this letter.

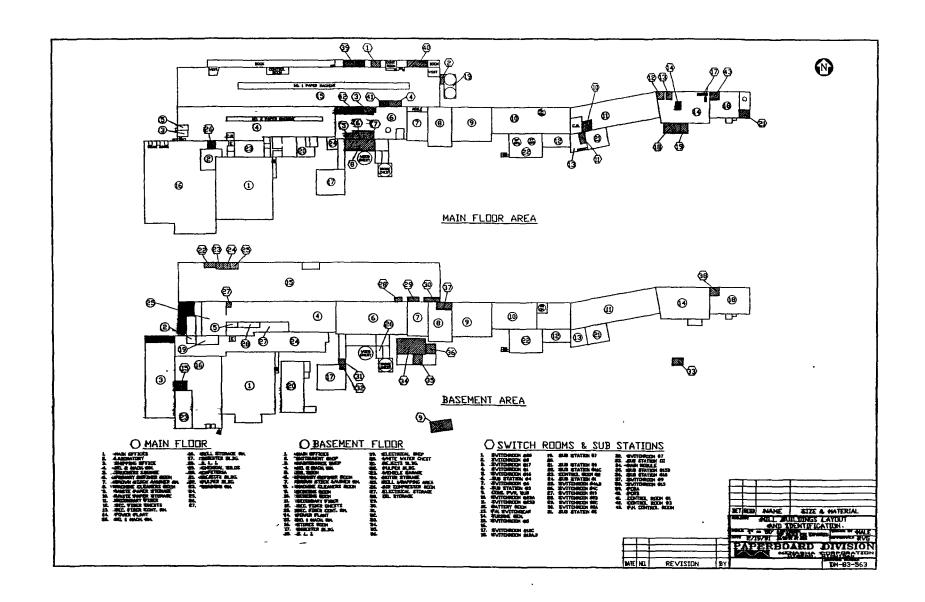
Sincerely,

Gregory & Danneffel / F.E. Surface Water Quality Division

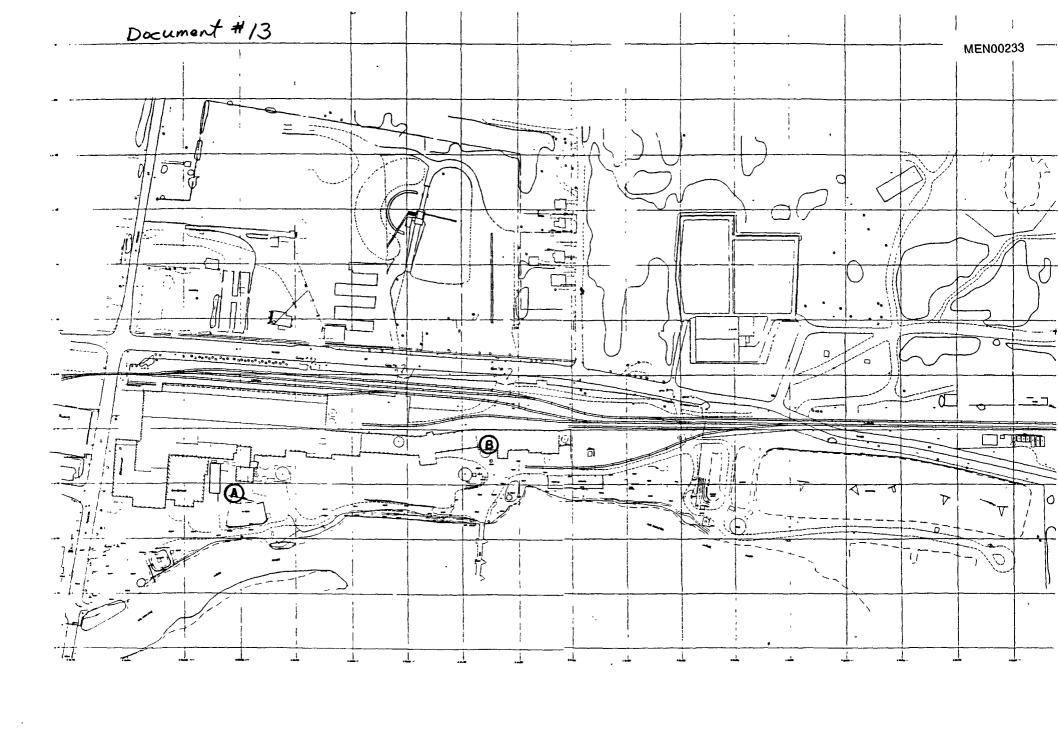
616-685-9886

GD:clm

ELECTRICAL EQUIPMENT-- PHYSICAL LOCATIONS



MAP OF ELECTRICAL GENERATING EQUIPMENT



LOCATION MAP OF FRESH WATER WELLS (PAST AND PRESENT), INCLUDING WELL LOGS





PEERLESS-MIDWEST, INC. Water Supply Contractors 1955 BILLEPSWELT BOAD / GRANGER INDIANA 16500 1979 19

WELL & PUMP INSPECTION REPORT

OWNER	<u> </u>	orneration	1			
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(place check m	ark when comp	oleted)				
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					p would have to b	
Well pur	mping quite	alot of	sand			
			INSDECT	FD RY	Gary Holt	
			INSPECT	LU 01	Har A HOT	

MICHIGAN DEPARTMENT OF CONSERVATION GEOLOGICAL SURVEY DIVISION

WE	LL SCHEDULE		11- 11)))10
Dat	February 14, 1963	. 19	Field No.	71
Rec	ord byJB		Office No	. WEZ .
	res of data Driller's recor	d		
_				
1.	Location: State Michigan			
	Map Acorox. 122' S. of	River St. &	150' E. of	power,
		3 T 11/1/16	NR 1/2 W	W
2.	Quari Menasha Corp-Paper	board ulv.	Itsego	
	Quart. Menasha Corp-Paper formerly otsego rails r	aper lls/ Addres		
	Daller Larme-Morthern			
3.	Тородгарку			7
4	Election			
5.	Type: Dug. drilled, driven, bored, je	sted 10-16 62		
	Depth: Rept. 93 ft. Mes.			
7.	Caring: Diam 30 in to 17	in, Type		—
	Depth 31 ft. Finish			
8.	Chief Aquifer		ft_ to	ft-
	Others			
9.	Water level 13 1t rept.	10_19_621	Xabook 51	rface
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12.	User Dom., Stock, PS., RR., Ind.,	Irr., Oba.		
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PEERLESS-MDWEST, INC. Water Supply Continctors 51255 BITTERSWEET ROAC/CPANGER, INDIANA 46530/219 272-9050

WELL & PUMP SERVICE INSPECTION REPORT

DWNER Menasha Corporation CITY Otsego S WELL NO. 4 LOCATION 12' N. of Corper of Builds DIA 34" x 16" DEPTH 87' TYPE WELL G DEPTH TO DEPTH TO SCREEN ID 12" SCREEN LENGTH 25' TOP OF SCR DATE DATES OF CLEANING 1969.71. DATE INSPECTED 2-3-84 PERSON TO CONTACT E CONTACT LOCATION At Plant At Plant CONTACT E CONTACT LOCATION At Plant DOI DOI DOI AFTER LAST 1982 20' 361 DOI DOI DOI AFTER LAST 1983 17' 402 DOI	ng & 100' S ravel Wall EEN62' 72,73,74,76 ON_TREXIONPHONE. UMPINGPR 67' 50' 56' 57' _METERVOLT	TYPE SCREEN	Red Eress -6141 SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE 8"
WELL NO. 4 LOCATION 12' N. of Corner of Builds DIA 34" x 16" DEPTH 87' TYPE WELL GOEPTH TO SCREEN ID 12" SCREEN LENGTH 25' TOP OF SCR DATE DRILLED 1967 DATES OF CLEANING 1969,71, DATE INSPECTED 2-3-84 PERSON TO CONTACT FOR CONTACT LOCATION At Plant DATE STATIC GPM ORIGINAL 1967 21' 1001 AFTER LAST CLEANING 1982 20' 361 AFTER LAST THE 1983 17' 402 PRESENT AT 1983 17' 402 PRESENT AT 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK 58516 PUMP MFG Layne/Floway SERIAL NUMBER (78-1008) PUMP MFG Layne/Floway SERIAL NUMBER (78-1008) PATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	ng & 100' S ravel Wall EEN62' 72,73,74,76 ON_TREXIONPHONE. UMPINGPR 67' 50' 56' 57' _METERVOLT	TYPE SCREEN	Red Eress -6141 SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE 8"
DIA 34" x 16" DEPTH 87' TYPE WELL GENTH TO SCREEN ID 12" SCREEN LENGTH 25' TOP OF CONTACT FROM TO CONTACT FROM TO CONTACT FROM TO CONTACT FROM TO CONTACT FROM TOP OF CONTACT FROM TO CONTACT FROM TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 FOR PUMP MFG Laving/Floway SERIAL NUMBER (72-1005) RATED CAPACITY: 600 GPM; 247' TDH; OPERATING DATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	Tavel Wall EEN62' 72,73,74,76 ON TEXTONPHONE. UMPING PR 67' 50' 56' 57' METERVOLT	TYPE SCREEN_0,78,80,82 616-692 RESSURE 110# 105# 103# FLANG S220/440 FLENGTH_	-6141 SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE 8"
DATE DRILLED 1967 DATES OF CLEANING 1969,71, DATE INSPECTED 2-3-84 PERSON TO CONTACT E CONTACT LOCATION At Plant DATE STATIC GPM ORIGINAL 1967 21' 1001 AFTER LAST CLEANING 1982 20' 361 AFTER LAST 1983 17' 402 PRESENT AT 1983 17' 402 PRESENT AT 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavre/Floway SERIAL NUMBER (79-1008) RATED CAPACITY: 600 GPM; 247' TDH; CPERATING DATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	72,73,74,76 QD_TE=X=QD PHONE . UMPING	616-692 RESSURE 110# 100# 103# FLANG S220/440F LENGTH	-6141 SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE 8"
DATE INSPECTED 2-3-84 PERSON TO CONTACT EXCONTACT LOCATION At Plant DATE	ON TERESON	616-692 RESSURE 110# 105# 100# 103# FLANG S220/440F LENGTH	-6141 SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE _8" RPM
DATE STATIC GPM FOR ORIGINAL 1967 21' 1001 AFTER LAST 1982 20' 361 AFTER LAST 1983 17' 402 PRESENT AT 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK 1000 SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavre/Floway SERIAL NUMBER (79-1000	PHONE . UMPING PR 67' 50' 56' 57' METER	616-692 RESSURE 110# 105# 100# 103# FLANG S220/440F LENGTH	SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE 8"
DATE STATIC GPM ORIGINAL 1967 21' 1001 AFTER LAST CLEANING 1982 20' 361 AFTER LAST TEST 1983 17' 402 PRESENT AT 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavne/Floway SERIAL NUMBER (79-1009) RATED CAPACITY: 600 GPM; 247' TDH; CPERATING PATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	UMPING PA 67' 50' 56' 57' METER	110# 105# 100# 103# FL ANG FL ANG S220/440 F LENGTH	SPECIFIC CAPACITY 21.7 12.0 10.3 10.0 E CR SIZE 8"
ORIGINAL 1967 21' 1001 AFTER LAST 1982 20' 361 AFTER LAST 1983 17' 402 IPRESENT AT 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavre/Floway SERIAL NUMBER (79-1009) RATED CAPACITY: 600 G PM; 247' TDH; OPERATING 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	50' 56' 57' METER	110# 105# 100# 103# FL ANG FREA S 220/440 F	21.7 12.0 10.3 10.0 E CR EX SIZE _8"
AFTER LAST CLEANING 1982 20' 361 AFTER LAST TEST 1983 17' 402 PRESENT AT LINE PRESSURE 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavre/Floway SERIAL NUMBER (78-1008) RATED CAPACITY: 600 G PM; 247' TDH; OPERATING DATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	67' 50' 56' 57' METER	110# 105# 100# 103# FL ANG FREA S 220/440 F	21.7 12.0 10.3 10.0 E CR EX SIZE _8"
AFTER LAST TEST 1983 17' 1985 17' 1985 17' 1985 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavne/Floway SERIAL NUMBER (79-1009) RATED CAPACITY: 600 G PM; 247' TDH; OPERATING PATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	_56' _57' _METER VOLT	100# 103# FL ANG 147E A S 220/440 F LENGTH	10.3 10.0 E CR SIZE 8"
AFTER LAST TEST 1983 17' 1985 17' 1985 17' 1985 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Lavne/Floway SERIAL NUMBER (79-1009) RATED CAPACITY: 600 G PM; 247' TDH; OPERATING PATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	57' METER VOLT AIRLINE	103# FLANG FHREA S220/440F LENGTH_	10.0 E CR SX SIZE <u>8"</u> RPM <u>1800</u>
INE PRESSURE 1984 20' 372 ST WILL BE COMPLETE THROUGH: TOP OF CHECK	_METERVOLT	FLANG HAREA S ^{220/440} F LENGTH_	E OR SIZE <u>8"</u> RPM <u>1800</u>
TOTAL PUMP SETTING 81' MOTOR HP 75 GEAR DRIVE 58516 PUMP MFG Layre/Floway SERIAL NUMBER (79-1009) RATED CAPACITY: 600 GPM; 247' TDH.; OPERATING PATE INSTALLED 1968 DATES OF OVERHAUL 1974,78 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING	VOLT	S ^{220/440} F	RPM
CHANGE MOTOR OIL & GREASE X REPACK PUMPLED NO NO PERMITTED NO PERMITTE	SCX PAVE S NSPECTION X GRE COJECTED CRVE CAPAC PS; 360 V ad with elbo	PRINGS2No EASE PUMI HTY 600 G OLTS, 3 ow, one holis	SIZE OF 3/8 PACKING 3/8 P X PM 258' TOP PH4SE se to tank d. One 8"

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INDIANTIPOLIS =	MISHAWAKA	•	LANSING

	Ca	dol dol	o. <u>1631</u> egan	
wmer Menasha Corp.	To Sa Ste	w <u>estip Ot</u> ction 2 Michi	sesa 3 TIN gan	I.RI
From Lond Description 12 T. of North loading doc From Street or Road 100 S. of River Street	ik 10'S. of R	Approx		
FOLULTION FOUND — DESCRICE FULLY	Dapis to for oil Strature	NATURAL Section of Streets	GROUN'D	LEVE
Till (Sand & Boulders)	0	8	8	
Drown Fire Sand	8	. 52	44	1/
Sandy Clay with gravel	52	57	5	
Brown Sand (Fine)	57	65	1 3	
Tire Sazd - Szall gravel	60_	70	1	1/2
Fine Sand	70	74	4	1
Conuse Graval and boulders	7.3.	<u> 7</u> 6_	1 2	<u>:</u>
Sandy Clay with gravel	. 76	77	!	<u> </u>
	· 	i	j	
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	Norm //	-ill.	Jak	
Sie	Augo	r		
Seek 3 24 "CD From 12 "Clove ground to 60 to	est below ground.	Veight	Pov	
Corden 12 "Sum 1 _ 13 to _ 75 feet) Note 30:				<u> 25</u>



PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD/GRANGER, INDIANA 46530/219 272-9050

WELL & PUMP SERVICE INSPECTION REPORT

	sha Corpora					
TY Ots						n
ELL NO 5	LOCATION	12' E. of I	cading Dock	& 10' S. of	RR	
A30" × 3	12"DEPTH	76'	TYPE WELL	Gravel Wa	TVOS	
CREEN ID	12" SCREEN I	ENGTH 15'	TOP OF '	SCREEN 6	SCREEN_	SSWW
TE DRILLED_	1970	DATES OF C	LE 4NING <u>1971</u>	,73,74,76,78	3,80,82,83	
TE INSPECTED	2-3-84	PERSON T	O CONTACT_	Ron Thaxi	on	
CNTACT LOCAT	ION At T	lant		РНС	NE <u>616-69</u>	2-6141
	DATE	STATIC	GPM.	PU'VANG LEVEL	PRESSURE	SPECIFIC CAPACITY
CRIGINAL	1970	26'	500	69'		11.6
FTER LAST CLEANING	1983 _	23'	257	55'		8.0
FTER LAST	1983	23'	271	68'	100#	6.0
RESENT AT	1984	23'	257	62'	104#	6.5
OTAL PUMP SE MP MFG. ATED CAPACITY: ATE INSTALLED. CHECK VALV HE FOLLOWING HANGE MOTOR PM METER RE MMP IS PRESE LECTRICAL DAT ATERIALS NEE	SOO G.S. 1970 E LEAKING? IS TO BE OIL & GRE QUIRED	SERIAL NO PM; 247' DATES OF COMMENT OF COMM	NUMBER 6396 _TDH; OPERA VERHAUL 1976 L DOES STUFF DURING EAC _REPACK PU GPM 302'TD ATION 33-33-3 Drop out 6"	AIRLE TING PRESSU ,81 ING BOX HAVE H INSPECTION IMP X PROJECTED 1; CURVE CA 4AMPS, 460 tee, two 6"	E SPRINGS 2NO E SPRINGS 2NO ON GREASE PUR PACITY 500 (SIZE OF 3/2 AP X SPM 240' TS PHASE SEE hoses to
tank and 10' t	TO RAISE	PUMP <u>2 No</u>	RE	MARKS' <u>Not</u>	or is screet	ned. Used o
60# pressure_g			<u></u>	.		
			: :-0:-0	3 Y R1	nosell E. Bu	ck



PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD/GRANGER, INDIANA 46530/219 272-9050

WELL & PUMP SERVICE INSPECTION REPORT

OWNER Menasha Corporation						
CITYOtsego				STATE	Michigar	1
WELL NO. 6 LOCATION 150' N. of RR & 1000' NE of Menacha (West Well)						
DIA. 12"	DEPTH	99'1	TYPE WELL_	Tubular		
SCREEN ID. 12	SCREEN (ENGTH 14 '9"	DEPTH TOP OF	SCREEN	TYPE SCREEN_	Type H Everdu
DATE DRILLED 1948 DATES OF CLEANING 1961,75,80,81,82,83,85						
DATE INSPECTED 3/14/86 PERSON TO CONTACT Ron Thankton						
CONTACT LOCATION At Plant PHONE 616-692-6141						-6141
	DATE	STATIC	G.P.M.	PUMPING LEVEL	PRESSURE	SPECIFIC CAPACITY
ORIGINAL	1948	18'	960	46'		34.2
AFTER LAST CLEANING	1985	29'	. 489	531	105#	20.3
AFTER LAST TEST	1985	26'	320	47 '	110#	15.2
RESENT AT	1986	261	420	58'	103#	13.1
TEST WILL BE COMPLETE THROUGH: TOP OF CHECKMETERXTHREAD SIZE						
TOTAL PUMP SETTING 754 MOTOR HP 60 GEAR DRIVE						
PUMP MFG. Peerless SERIAL NUMBER 76045 AIRLINE LENGTH 60'						
RATED CAPACITY: 750 G.P.M.; 250' T.D.H.; OPERATING PRESSURE						
DATE INSTALLED 1949 DATES OF OVERHAUL 1961,67,71, converted 73,79,85						
IS CHECK VALVE LEAKING? YES NO X DOES STUFFING BOX HAVE SPRINGS 2No PACKING 1/2"						
THE FOLLOWING IS TO BE PERFORMED DURING EACH INSPECTION:						
CHANGE MOTOR OIL & GREASE X REPACK PUMP X GREASE PUMP X						
RPM METER REQUIRED No PROJECTED PROJ						
ELECTRICAL DATA WITH PUMP IN OPERATION 60,60,61 AMPS; 460 VOLTS; 3 PHASE						
MATERIALS NEEDED TO CLEAN WELL: Drop out spool, two elbows off 8" head, two hoses to						
tank and two hoses to waste.						
NEED A SMEAL TO RAISE PUMP? No REMARKS: Motor is screened.						
INSPECTED BY Tony J. Ross						



PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD/GRANGER, INDIANA 46530/219 272-9050

WELL & PUMP SERVICE INSPECTION REPORT

•	WELL O	i i Oitii Ot	-114106 1140	JI LOTION	ILLI OILI	
OWNER Men	asha Corpora	tion				
CITYOts	ego			STATE	Michiga	n
WELL NO	LOCATION				·····	
DIA12"	DEPTH	100'	TYPE WELL -	Tubular		
SCREEN ID. 12"	SCREEN L	ENGTH 15'	DEPTH 1 TOP OF	O SCREENE	TYPE SCREEN_	Type H
DATE DRILLED_	1948	DATES OF C	LEANING 1975	,76,84		
DATE INSPECTE	D3/14/86	PERSON T	O CONTACT_	Ron Thaxt	on	
CONTACT LOCAT	ION At Pla	nt	······································	РНО	NE616-69	2-6141
	DATE	STATIC	G.P.M.	PUMPING LEVEL	PRESSURE	SPECIFIC CAPACITY
ORIGINAL	1965	25 '	5 96	42 *		35.0
AFTER LAST CLEANING	1984	271	467	345'		62.2
AFTER LAST TEST	1985	26!	355	30'	110#	88.7
RESENT AT	1986	28 '	430	38'		43.0
TEST WILL BE COMPLETE THROUGH: TOP OF CHECK METER X WAREXXX SIZE BTOTAL PUMP SETTING 74'9'MOTOR HP 50 GEAR DRIVE VOLTS 440 RPM 1800 PUMP MFG Peerless/Floway SERIAL NUMBER 94182 AIRLINE LENGTH 75.' RATED CAPACITY: 500 G.P.M.; 255' T.D.H.; OPERATING PRESSURE DATE INSTALLED 1977 DATES OF OVERHAUL 1983 IS CHECK VALVE LEAKING? YES NO X DOES STUFFING BOX HAVE SPRINGS? No PACKING 3/8" THE FOLLOWING IS TO BE PERFORMED DURING EACH INSPECTION: CHANGE MOTOR OIL & GREASE X REPACK PUMP X GREASE PUMP X RPM METER REQUIRED No PROJECTED PUMP IS PRESENTLY DEVELOPING 430 GPM 269' T.D.H.; CURVE CAPACITY 500 GPM 238' T.D.H. ELECTRICAL DATA WITH PUMP IN OPERATION58-58-59 AMPS; 460 VOLTS; 3 PHASE MATERIALS NEEDED TO CLEAN WELL: Turn pump off head, two hoses to tank and two hoses to waste.						
NEED A SMEAL			RE		cor is screen	ned.
			INSPECTED	BYTor	ny J. Ross	

1418

	WAIEK W	ELL KEC	
1 LOCATION OF WELL		ifter tion	
			Section Number Junis Number Range Number
Stance And Direction from Road Intersections			93 N.S. E/W
~		_	MINASIA CORPORATION
40° E. OF PENNIT MAID BE	\sim 0. α	-	• 1
RIVER.			44 th to 2 a
Street audituss & City of Well Location			UTSEGO, MICHIGAN
Locate with "X" in section below Sketch	May.		4 WELL DEPTH (completed) Date of Consistion
			80 n. 1-29.79
			Cable tool Rolary Driven Duy Hollow rod Dettee Bored ZEC
·			
			6 USE: Domestic Public Supply Industry
1			Irrigation Air Conditioning Commercial
			Test Well
·			7 CASING: Threaded Welded Height: Abive Below
1 will g			SurfaceII.
2 FORMATION	THICKHESS OF	DEPTH TO	12 in. to 62 it. Duuth Weight 3/ 16s. 1t.
I	STRATUM	STRATUM	in, toIt. Death Drive Shoe? Yes No 1
			8 SCREEN:
DIRTY SHAN GRAVE!		1)	Type-JU11/2011 W/W Dia. 12"
DRTY SHND, GRAVEL			Type JC/1230A/ K/W Dia 13" Stot/ Gauza 030 Length 20"
CLAY	15	26	Set between Of the and Oft.
	1		
JEINE THE	1-4	40	Fittings:
FINE ZAND			19 STATIC WATER LEVEL
A	36	76	//ts, below land surface
MOURSE SAND	+		10 PUMPING LEVEL below land surface
	4	80	41 11, after 8 hrs. pumping 800 g.p.m.
DURSE CAPAMEL BOULDERS	1 7		11. after O hrs. Dumping C OO g.p.m.
The state of the s	_	_	
LAY, BOULDERS		<u> </u>	ft, after hrs. pumping g.p.m.
			11 WATER QUALITY IN Parts Per Million:
	1		Iron (Fe) Chlorides (CI)
	1	ļ	
1 '	1		HardnessOther
l,	1		12 WELL HEAD COMPLETION: In Approved Pit
•	Ì		Pittess Adapter X 12" Above Grade
	1		13 Well Groutes? Yes No
},	1	}	Nual Cement Sentonite
I	1		Death: From /4 It. to 57 It.
			14 Nearest Source of possible contamination
*:	†	 	feet Direction Type
	1		Wetl disinfected woon completion Yes No
		 	
	1	1	15 PUMP: Not installed
<u> </u>	- 	 	Manufacturer's Name
1	1	}	Model Number HP Volts
	1	!	Length of Drop Pipeft. capacityG.P.M.
	l .	1	Type: Submersible
			jet Reciprocating
			7 -
USE A ZND SHEET IF BEEDED			
16 Remarks, elevation, source of data, etc.		17 WATE	R WELL CONTRACTOR'S CERTIFICATION:
Ĭ		This	all was drilled under my jurisdiction and this report is frue
- -		10 the	bust of my knowledge and belief.
		AE AE	DEST OF THE ENGINEES NAME REGISTRATION NO.
		1	
		Addre	» <u>: : : : : : : : : : : : : : : : : : :</u>
:			(R) Direction Date 3 23 7
			Date 3



PEERLESS-MIDWEST, INC. Water Supply Contractors 51255 BITTERSWEET ROAD/GRANGER, INDIANA 46530/219 272-9050

WELL & PUMP SERVICE INSPECTION REPORT

OWNER Men	asha Corpora	tion				
CITYOts	ego			STATE	Michigan	
WELL NO. B	LOCATION	40' E. o	f Plant & 80	N. of Rive	r	
$30'' \times 1$	^{2"} DEPTH	80'	TYPE WELL	Gravel Wa	11	
SCREEN ID1	2" SCREEN L	ENGTH 20	DEPTH TOP OF	TO SCREEN6	O' SCREEN_	SSWW
DATE DRILLED	1979 (DATES OF C	LEANING_198	1,82,85		
DATE INSPECTE			O CONTACT_	Ron Thaxt	on	· · · · · · · · · · · · · · · · · · ·
CONTACT LOCA	TION At 1	Plant		PHO	NE616-69	2-6141
	DATE	STATIC	G.P.M.	PUMPING LEVEL	PRESSURE	SPECIFIC CAPACITY
ORIGINAL	1979	11'	800	52 1		19.5
AFTER LAST CLEANING	1985	13'	323	531		8.0
AFTER LAST	1985	12'	214	531		5.2
FSENT AT E PRESSURE	1986	11'	267	54 †	115#	6.2
EST WILL BE	COMPLETE TH	ROUGH: TOP (OF CHECK	METER_	XPXXXX THREA	AD SIZE 4"
OTAL PUMP SI	ETTING 69 '4"N	10TOR HP	GEAR DRIV	EV	OLT \$20/440	RPM1760
UMP MFG Lay	ne/Peerless	SERIAL N	UMBER 460	96AIRL	INE LENGTH_	55'
ATED CAPACITY						
ATE INSTALLED	1979	DATES OF O	VERHAUL 1982	2,85 pump onl	У	0.75 0.5
CHECK VALV	E LEAKING?	YESNO_X	LDOES STUFF	ING BOX HAVE	SPRINGS 2 No	SIZE OF PACKING 3/8"
HE FOLLOWING	IS TO BE F	PERFORMED	DURING EAC	H INSPECTIO	N:	
HANGE MOTOR	OIL & GRE	ASEX_	_REPACK PU	MPX	GREASE PUM	PX
PM METER RE	QUIRED	No	_ ,	PPO IECTED		
				•		
ECTRICAL DAT	A WITH PUM	P IN OPERA	TION63-63-64	AMPS; 460	VOLTS;3	PHASE
ATERIALS NEE	DED TO CLE	AN WELL:_				
					· · · · · · · · · · · · · · · · · · ·	
FED A SMEAL a 160# pres						ed. Used
100% pres.	sure gauge.					
		····				
			INSPECTED	BYTon	y J. Ross	
						



TEST DRILLING REPORT

TW 901 Otsego			_	Allegan		
Well No TW 90A City Otsego			County			
Owner Menasha Corporation			Township_	Otsego;	TlN,R12	W.
			Section	NW NW NW N	E¼ of 23	3
Location			State	Michiga	n	
Approximately 100' SW of Well #6 & 100' Nor	th of RF	Crossin	ng on Eas	st River	Street;	
1800' East of Farmer Street						
GRADE ELEVATION ABOVE MEAN SEA LEVEL — 715	(1 + 31					
FORMATION	Top of Formation	Bottom of Formation	Thickness	Static Water Level	50% SIZE From:	
Brown to Black Silty Fine Sand with Fine to Coarse Gravel	0'	4'	4'	-	Sieve A	analysi
Brown Fine Sand with Fine to Coarse Gravel	41	61	2'	_	_	
Reddish-Brown Fine Sand	6'	12.51	6.51	-	_	
Brown Fine Sand w/Fine to Coarse Gravel	12.5'	15'	2.5'	_		
Brown Fine to Medium Sand, Little Coarse Sand & Fine Gravel	15'	27'	12'	24'	-	
Brown Fine to Medium Sand	27'	32'	51	24'	-	
Heaving Brown Med. to Fine Sand, Little Coarse Sand & Fine Gravel	32'	41'	91	24'		
Heaving Brown Med. to Coarse Sand & Fine to Medium Gravel	41'	48'	7'	24'	-	
Heaving Brown Med. to Fine Sand with Coarse Sand, Some Stones	48'	62 '	14'	24'	.015	
Heaving Brown Coarse to Fine Sand with Fine to Medium Gravel	62'	68'	6'	24'	.028	
Heaving Brown Coarse to Fine Sand, Some Fir to Medium Gravel	68'	74.5'	6.5'	24'	.022	
Heaving Brown Medium to Fine Sand, Some Ver Fine Sand, Little Coarse Sand	Y 74.5'	77'	2.5'	24'	.011	
Tight Brown Medium to Fine Sand, Little Very Fine Sand & Coarse Sand, Silt Traces	77'	88'	11'	24'	.013	
6-5/8" Dia. hole drilled by hollow-stem auger	Date	e complete	ed <u>J</u> 1	une 13, 1	1990	
None " casing set to	lone sc	reen set f	rom	' to _	,	
20' & 10' ft. of12" SSWW screen recommend	ed from	63' to 8	3' × xx	88' to	98'	
Recommended screen slot size: Tubular wellNot_Rec	commende	d Gravel	Pack well	Bottom	.060"	
Water analysis Iron PPM.				PG, PH Annable		
Job No8569		Crai				

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	الأرابالرطورون فأكرار فيراكي المراكية المراكية المراكية المراكية المراكية
_	INCORPORATES -
	INDIANA DOLAS ANGULANAS ANGUNO

_ TEST		
** PERMANENT	Job N	c. 16455
WELL LOG No. 4 CITY Otsego	County_Al	legan
Owner City of Otsego	Town:ip	Otsego
	Section	23 TIN, R12L
Location	State Mich	nigan
From Land Description 800' East of Hwy 89, 500' East	of City Limits	200' Str of
From Street or Road Kal River (300' NE of Well #3		

	FROM	NATURAL	GROUND	LEVEL
FORMATION FOUND — DESCRIBE FULLY	Depth to Top of Stronom	Depte to Eastern of Stratum	Thickness of Stratum	Sterie Wete Leve
Fill	0	14	14	
Fine Sand	14	20	6	12
Coarse Sand	20	31	111	12
Boulders & Gravel	31	46	15	12
Silty Sand	46	50	4	
Coerse Sand	50	84	34	12
Fine Sand	. 84	86	2	12
Coarse Sand & Gravel	86	90	4	12
Fine Sand	90	97	7	12
Coarse Sand	97	107	10	12
Coarse Sand - Gravel	107	120	113	12
Clay	120	121		
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Nata 30" "Dia Daillad b	Cable Tool	_ Rotary	Jetting
note Did Drilled by: 4	Reverse Circ. X	_ Bucket	Auger Other 79.5 Pounds per foot
Rotary Hole Grouted: Neat Ceme	nt <u> </u>	ling Mud Scarce	5 there of the con-
Casing 30 "OD From 1	"above ground to	. 87 feet below g	round. Weight 79.5 Pounds per foot
Pumping test 1200 G	PM drawaown to52	feet after	Stot0358hours pumping 3

/-13-71

SUBMERGED COMBUSTION EVAPORATORS

DOCUMENT #15

PAPERBOARD DIVISION OTSEGO, MICHIGAN • 616 • 692-6141 September 12, 1968

Air Pollution Control Section Division of Occupational Health Michigan Department of Public Health 3500 North Logan Street Lansing, Michigan 48914

Gentlemen:

Please find attached our application for the installation and use of one (1) Selas Subcomco Transchanger Evaporator. This evaporator is to be used to concentrate spent sulfite liquor. It is being installed to prevent the release of spent liquor to the Kalamazoo River and thus eliminating a water pollution problem.

We have operated the same type of evaporator since 1962 with no noticeable air pollution problem. However, to be certain the emission of the present evaporator conformed to state standards, a stack survey was made. The results of this survey are attached as evidence that the new evaporator will meet emission requirements.

Very truly yours,

MENASHA CORPORATION

K. E. Lowe Technical Manager km

Enclosures

FOUNDED 1849

APPLICATION TO THE AIR POLLUTION CONTROL COMMISSION

APPENDIX I

1. EQUIPMENT LOCATION DRAWINGS

See Drawing D-10-67.

2. EQUIPMENT SPECIFICATION

Make: One (1) Selas Subcomco Transchanger Evaporator Model: No Model Number, Reference Name Plate No. 110063 Size: 12,000,000 Btu/hr. or 12,000 cubic feet Natural Gas/hr.

Type: Gas Fired Submerged Combustion Evaporator

3. PROCESS OR USE SPECIFICATION

See Appendix 2.

4. OPERATING SCHEDULE

Days/year 340 Hours/day 24

The unit will normally be down during the first 10 days of July each year and Christmas week.

5. PROCESS WEIGHT

Type: 20% Solids Spent Sulfite Liquor

Feed Rate: 13,000 lbs/hour (12,000 lbs/hour for present evaporation)

6. FUELS OR FIRING DEVICE

Type: Natural Gas

Rate: 12,000 cubic feet/hour Btu: 950/1000 cubic feet of gas

Firing Device:

Make: (1) Gas Burner Selas No. 2

(1) Gas Burner Selas No. 1

Model: Selas No. 2mand Selas No. 1

Size: Selas No. 2 - 2,000 CFH Selas No. 1 - 10,000 CFM

7. FLOW DIAGRAM

C-11-44

See Drawing

Page 2

MEN00250

8.	DRAWING	OR	<u>EQUIPMENT</u>

a.	See drawing SK-12568D for equipment details.
b.	See drawing D-11-40 for stack-separator equipment.
c.	Horsepower Rates .
	Blower:
	Liquor Pump:
đ.	Testing Source:
	See Drawing 3-M

APPENDIX 2

PROCESS OR USE SPECIFICATION

1. GENERAL

The Selas Subcomco Transchanger Evaporator is a gas fired horizontal Submerged Combustion Evaporator. The evaporator is used to concentrate spent sulfite liquor of 20% solids to a concentrated liquor of 45-50% solids.

2. PROCESS MATERIAL DESCRIPTION: SPENT SULFITE LIQUOR is the liquid waste resulting from the pulping (cooking) of hardwood species by the neutral sulfite semi-chemical pulping process. The liquor is primarily composed of sodium lignosulfonates, degraded sugars, and ash. A typical analysis is:

Solids, % 20

Btu 5700 (per lb. dry solids)

Na₂0, % 3.7 (exists as sodium carbonate, sulfite and sulfate)

Ash, % 7.2

S, % 1.0 (exists as sulfates and sulfites)

3. PROCESS DESCRIPTION

Approximately 20,000 gallons (40,000 gallons in 1969) of spent sulfite liquor is discharged from the pulp mill per day into a liquor holding lagoon. From the lagoon, the liquor is pumped to a 200,000 gallon storage tank. The liquor flows from the storage tank by gravity to the receiver tank of the evaporator. The receiver tank holds 1,400 gallons of liquor.

From the receiver tank the liquor is pumped by 600 GPM vertical-centrifugal pump to the <u>feed nozzle</u> (liquor feed nozzle) of the evaporator chamber. The liquor is sprayed on the gas flame from 12 - 1-1/2 inch diameter holes arranged evenly around the feed nozzle chamber. Water is flashed off(evaporated) when the liquor cames in contact with the flame. The liquor-water vapor mixture then flows to a liquid-gas separator. The gas-vapor mixture exits through the 48 foot (16-7/8" diameter) stack and the liquor flows to the receiver tank. Excess concentrated liquor overflows from the receiver tank to the holding lagoon. Liquor concentration is determined by the rate of liquor feed and recirculation rate.

4. OPERATING CONDITIONS (New Evaporator) (a)

Gas Rate: 12,000 CFH
Process Rate: 13,000 lb/hour
Feed Liquor Temp., F. 160
Circulate Liquor Temp., F. 220
Stack Temp., F. 185 - 190
Stack Pressure, in. Water 0.50
Blower Capacity, SCFH 120,000
Liquor Recirculation Rate, GPM 600

Process Rate:

Liquor In, lb/hour	13,000
Solids	20%
Liquor Out, 1b./hour	4,700
Solids	55%
Evaporation Rate, lb/hour	8.300

(a) Design Data

5. FLUE GAS ANALYSIS

To determine the nature of the emissions from the evaporator a stack survey was made on the existing evaporator, which was installed in 1962 and is a duplicate of the new evaporator except for gas capacity. The gas capacity of the old evaporator is 10,000 CFH.

Since this was a "wet" stack, gas impingers were used to collect the emission from the stack and to trap the water. A diagram of the collection equipment used is attached in Drawing 3-M. The results of the gas velocity measurements and two stack determinations are included in Appendix 3.

These data are summarized below:

Average Stack Volume, CFM (stack conditions)	4,566
Average Total Weight Emissions, grams	0.204
Average Sample Volume, Cubic Feet (stack conditions)	20.9
Emission Rate, lb/hour	6.3
lb/day	150

Based on the data published in ACT 348 of 1965, the allowable emission rate for a process rate of 12,000 lb/hour is 13.6 lb/hour. Thus, the emission rate from the present evaporator is within the allowable rates. Since the design of the new evaporator is

the same as the old evaporator, the emission rate of the new evaporator should meet the requirements of Act 348 of 1965.

The nature of the emissions from the evaporator stacks are mainly composed of liquor carryover, which is water soluble. About 36% of the emissions collected in the impingers were insoluble. This has been identified as a fly ash-like material. The suspended solids obtained were:

1b/hour 2.3 1b/day 55



GEORGE ROMNEY, Governor
R. GERALD RICE, M.D., Director

STATE OF MICHIGAN DEPARTMENT OF PUBLIC HEALTH

3500 N. LOGAN, LANSING, MICHIGAN 48914

ker"

September 24, 1968

Menasha Corporation Paperboard Division P. O. Box 155 Otsego, Michigan 49078

Attention: Mr. Joseph Cutro, General Manager

Gentlemen:

Enclosed please find our approved permit for the installation of the proposed Selas Succomcu Transchanger Evaporator as described and specified for the concentration of spent sulfite liquor wastes.

The test result information provided does indicate no undue emission of particulate material from this system. Final approval to operate the system will of course be based on evaluation of actual performance following completion of the installation and subsequent start-up of on-line operation.

Evaluation will include determination of nulsance odor or gases as well as particulate material emission. Please advise us upon completion and start-up of the system. If you have any further questions, please call on me. Thank you for your cooperation.

Very truly yours,

DIVISION OF OCCUPATIONAL ADALTH

Charl G. Oviatt, Engineer Air Pollution Control Section

CGO: Jip Enclosure

Pulp mill 'shrinks' liquor disposal chore

Low cost, horizontal evaporator boasts 82% thermal efficiency, reduces product to 50% solids. Slash in volume permits year-around storage, simplifies disposal during warm months

K. E. LOWE, Technical Manager
J. CUTRO, General Manager
and E. R. TIMLOWSKI, Technical Supervisor
Menasha Corporation, Otsego, Michigan

CP Staff

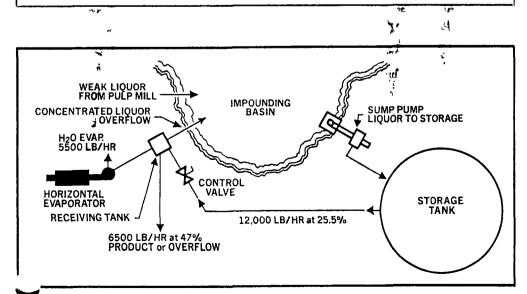
Air pollution control needs met too

STACK EMISSIONS from the horizontal evaporator's liquid-gas separator section are reported to fall well within the State of Michigan's standards. For a process feed flow of 12,000 lb/hr, the permissible rate is 13.6 lb/hr. The actual measured flow from the stack is only 6.3 lb/hr.

SHORTLY AFTER STARTUP, at a low liquor feed-rate, some carryover of burned particles was noticed in the area surrounding the evaporator. However,

installation of a high-volume liquor feed pump essentially eliminated this.

A STACK SURVEY was made shortly thereafter. Since this was a "wet" stack, typical "dry" stack sampling procedures could not be applied. Therefore, a train of gas impingers was used to absorb the emission in water. Approximately 70% of the emissions were composed of liquor carryover, while 30% were identified as flyash-like particles.



A 2.5 TO 1 REDUCTION in sulfite liquor volume is being achieved by evaporator serving this storage system at Menasha's pulp and paper mill in Otsego, Michigan

NEW SOLUTIONS OF PLANT PROBLEMS

Problem: An efficient and economica method of reducing 20,000 gpd of 18% solids spent neutral sulfite liquor to 6700 gal was needed at the Otsego, Michigan pulp and paper mill of the Menasha Corporation. Trimming the volume would permit the liquor to be impounded year-around in an existing 2.5 million-gal storage basin.

During warm months, the concentrated solids-waste product can be applied to local unpaved roads as a binder. Up to 2. million gal is used from late April to early October.

Concentrating the spent liquor to the manageable 6700-gpd volume meant removing 13,300 gpd of water. Multiple-effect evaporators were considered for the task. They were ruled out. Reasons: High initial investment costs and the mill's limited steam capacity.

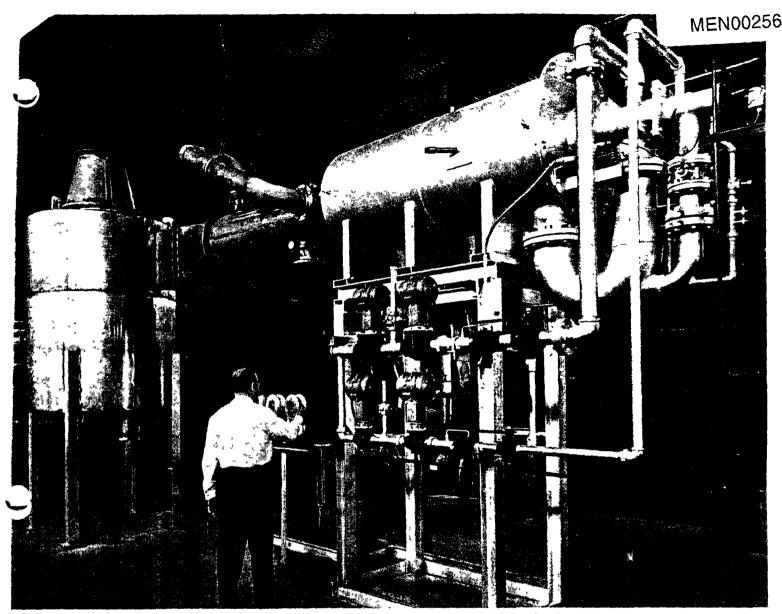
Solution: Based on previous successfuexperience with a similar unit, a specially developed, modified submerged-combustion evaporator was installed in early 1968 Known as a Transchanger concentrator-evaporator, a unique feature is the unithorizontal design (see photo). In it, there are no heat transfer surfaces to become clogged or charred, thereby ensuring maximum thermal efficiency.

Major components include dual (2000 and 8000 cfh) natural-gas burners; bricklined, steel-jacketed combustion chambe (10 million Btu/hr rating); rotary positive-displacement blower (100,000 cfh) jacketed stainless-steel feed chamber double-walled preheater and cooling jacket; liquid-gas separator with stack and a stainless 1400-gal receiving tank.

The process, as conducted at Menasha is as follows: Weak liquor (about 25.5%, solids) from the impounding basin i pumped to a 200,000-gal storage tank. From here, it is fed by gravity to the evaporator's 1400-gal receiving tank. Flow is about 12,000 lb/hr. It is controlled by butterfly valve just ahead of the tank

The liquor is pumped at 440 gpm through a preheater and then at 100°F injected into the evaporator's feed chamber. Here it is vaporized by hot gases coming from the combustion section. Moistura flashes off and the entire mixture move into the liquid-gas separator almost in stantly. Baffles remove the concentrated liquor from the water vapor, which passes up the stack. The stack is insulated to prevent condensation and refluxing actions.

The 220°F concentrated liquor is with drawn from the bottom of the separato and returned to the 1400-gal receiving tank where it is again combined with the



NO CHARRING, BURNING OR SCALING of critical parts that can reduce heat transfer efficiency is reported with this compact, horizontal-design evaporator. Liquid-gas separator is at far left. Equipment such as this is concentrating 12,000 lb/hr of waste neutral sulfite liquor at the paper mill installation discussed in the accompanying article

weak liquor being fed into it. Optimum level is maintained in the tank via an overflow line leading back to the 2.5 million-gal storage basin, Draw off is possible too.

All surfaces of the evaporator coming into contact with the spent sulfite liquor are made of type 316 stainless steel. The high injection rate (440 gpm) through the feed-chamber nozzles minimizes combustion and charring of organic materials in the liquor. Consequently, the Btu value of solids in the liquor is essentially the same as for those in dilute material.

Results: The spent sulfite liquor can w be impounded on a year-around basis the mill, simplifying disposal during the warm months. The evaporator concentrates the liquor efficiently and economically Reduction in volume under normal operating conditions is 25 to 1 Water

evaporation rate is about 5500 lb/hr, or 15,840 gpd, which is well above the 13,300 gpd sought originally.

Solids content of the concentrated liquor is controlled between 45-50% — although 55% can be obtained, if needed. Thermal efficiency of the evaporator is approximately 82%. This accounts for the energy needed to heat the liquor, the combustion air, and to evaporate 5500 lb/hr water.

Fuel costs average \$92 to \$120/day. With a fuel consumption rate of 8500 cfh, this calculates to about \$0.46 per ton of paper produced at the mill. There are no direct operating manpower requirements.

The direct cost of evaporating 1000 lb of water is \$0.69. This may appear to be somewhat high. However, from an investment standpoint, costs on a per ton basis are considered to be reasonable

The total operating and investment costs per ton of paper are \$0.65, based on producing 200 tpd for a 350-day operating year. The initial installed investment for the equipment was about \$65,000 — or approximately only one-third the price of

Transchanger concentrator-evaporator—In relieving their spent sulfite liquor storage problem, Menasha Corporation installed an evaporator manufactured by this compact, Selas Corporation of America, Dresher, Pa. 19025. Circle 192 opposite last page.

conventional evaporation or drying equipment of equivalent capacity. The capital outlay is being charged off over a 10-yr period. Maintenance expenditures average about \$3000 \r



September 20, 1985

Cal Peters
Department of Natural Resources
621 10th St.
Plainwell, MI 49080

Dear Cal:

The permit for construction and operation of our Selas Subcomco Transchanger Evaporator can be voided. This permit was issued to Menasha Corporation on September 19, 1968. The installation of new equipment allowed us to completely and permanently remove this evaporator from the plant premises. If you have any additional questions, please contact the writer.

Sincerely,

Menasha Corporation

John R. Blauwkamp, P.E.

Corporate Environmental Manager

John R Blanwhorp P. E.

kј



"MOMAS J. ANDERSON RLENE J. FLUHARTY EPHEN V. MONSMA U. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING BOX 30028 LANSING, MI 48909

RONALD O. SKOOG, Director

NOV 6 1985

Mr. John R. Blauwkamp, P.E. Corporate Environmental Manager Menasha Corporation Farmer Street Otsego, Michigan 49078

Dear Mr. Blauwkamp:

This letter is in reference to your Permit to Install issued on September 19, 1968, for a Selas Subcomco Transchanger Evaporator, located at Farmer Street, Otsego, Michigan.

This permit, identified as No. 204-68, has been voided per your letter dated September 20, 1985.

Please contact me if you have any questions concerning this action.

Sincerely,

Dhruman Shah, Engineer Northwest Permit Unit Air Quality Division 517-322-1333

DS:jmc Enclosure

cc: Dick VandeBunt

AIR POLLUTION CONTROL SECTION DIVISION OF OCCUPATIONAL HEALTH MICHIGAN DEPARTMENT OF PUBLIC HEALTH 3500 North Logan Street, Lansing, Michigan 48914

204-68

"LICATION TO THE AIR POLLUTION CONTROL COMMISSION

for authority to construct, install or alter

and

for permit to operate process, fuel burning, re	crose borning and, or an portonion	• •
1. PERMIT TO BE ISSUED TO: (Business License Name of Corporatio	n, Partnership, Individual Owner, Governme	ental Agency)
MEMASHA CORPORATION, PAPERBOARD	DIVISION	
2. MAILING ADDRESS: (Number, Street, City or Village, Zip Code)		
P.O. Box 155, Otsego, Michigan		
3. EQUIPMENT OR PROCESS LOCATION: (Number, Street, City or Vil	llage, Township, Zip Code)	
Same		
4. TYPE OF ORGANIZATION:	artnership 🔲 Individual Ow	ner Governmental Agency
5. GENERAL NATURE OF BUSINESS: Paperboard Manufacturing		
	mission to construct, install or alter a	nd to operate the following equipment
emponded instead of released to a water pollution problem.	tue varameroo kiver.	Thus, eliminating
7. ESTIMATED COST: Air Pollution Control Equipment \$ 1	,000.00 Total Project	\$ 65,000.00
		\$ 65,000.00
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated Starting Date	Estimated Completion Date
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated \$100 Date 9/1/68	Estimated
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated Stocting Date	Estimated Completion Date 1 1/1/68
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated Stocting Date TION CONTROL PERMIT NUMBER, IF AN (Permit N	Estimated Completing Date 11/1/68
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated \$10,100 Date 10,100	Estimated Completion Date 111/1/68 NY: (umber)None
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated Stocting Date Particles TION CONTROL PERMIT NUMBER, IF AN (Permit N EMBER OF FIRM: (Title) (Date) 9 - 4-60	Estimated Completing Date 11/1/68 WY: Sumber/None
7. ESTIMATED COST: Air Pollution Control Equipment \$	Estimated Stocking Date A STOCKING DATE TION CONTROL PERMIT NUMBER, IF AN (Permit N EMBER OF FIRM: (Title) (Date) 9 - 4-60	Estimated Completing Date 11/1/68 NY: (umber) NOTE
7. ESTIMATED COST: Air Pollution Control Equipment \$ 1. 8. PRESENT STATUS OF EQUIPMENT: (Check and complete applitude) () Construction or installation not started () Construction or installation partly completed	Estimated Storing Date TON CONTROL PERMIT NUMBER, IF AN (Permit N EMBER OF FIRM: (Title) (Date) 9-4-64	Estimated Completion Date 11/1/68 NY: (umber)None

NK PITCH TESTS

DOCUMENT #16

Buckman Laboratories, Inc.

BUCKMAN LABORATORIES INTERNATIONAL, INC

AUSTRALIA CANADA SOUTH AFRICA

BELGIUM JAPAN U.S.A. Memphis Tenn

BRAZIL MEXICO U.S.A. Cadet Missouri

1256 NO MCLEAN BLVD / P O BOX 8305 / MEMPHIS, TN 38108, U S A / TELEPHONE (901) 278-0330 / TELEX 6828020 534587 / CABLE ADDRESS BULAB

July 13, 1987

Mr. Gary Roys Menasha Corporation 320 N. Farmer St. Otsego, MI 49078

Dear Mr. Roys:

You recently gave us the opportunity to demonstrate our new N-K pitch test in your mill. This test is a qualitative/quantitative method of evaluating the level of extraneous material on paper machines and associated systems. The results are enclosed for your review.

The test conducted 5-20-87 compared contamination levels as fiber travels through your cleaning system. Also conducted was a comparison of the effect of different dispersants on washing virgin pulp from the Defibrator screen. The results indicate that use of a dispersant at this point, particularly Busperse 251, would substantially improve the washing process and resulting pulp quality.

During our evaluations, we found the N-K pitch test quite reliable in evaluating the effectiveness of a cleaning mode, and as such could be used to evaluate both chemical and mechanical cleaning trials.

The Krofta and DSM screens, handling secondary fiber cleaning rejects, were evaluated on June 3.

The enclosed results indicate the DSM was considerably more effective at removing materials from the water than the Krofta. However, the efficiency of the Krofta could be dramatically improved by the addition of Bufloc A2. Bufloc A2 is a very high molecular weight anionic polymer, which would aid in flocculation of solids, allowing more effective removal in these apparatuses.

Using the N-K pitch test, a trial could be conducted and evaluated, all in the same day, the same as our original comparison to the DSM screen.

Letter to Mr. Gary Roys Menasha Corporation

If you have any further questions or comments, please feel free to contact me.

Regards,

BUCKMAN LABORATORIES, INC.

Carl A. Randles, III, District Manager

trs

Attachments

cc: Mr. John Bonham

Mr. Mark Reed

Menasha Corporation

N-K Pitch Test Results

To: Gary Roys Date: June 15, 1987

5/20/87 Defibrator

Cont Pulp: Grams of Material/Bottle

Bsp 47 Bsp 59L0 Bsp 251

WT. .0807 .0510 .0605 .0219

GR.

CLEANING EFFICIENCY:

Recycle
Recycle Feed Top Thickening Virgin DEF Virgin DKP

WT. .0770 .0169 .382 .346

GR.

6/3/87 RECYCLED FIBER CLEANER REJECTS

<u>Feed</u>		Krofta Acc	D S M Acc	
WT	.1530	.1222	.0494	A
Gr.	.1095	.1151	.0735	В

PESTICIDE TESTING

DOCUMENT #17



TO:

Mark Reed

DATE: November 18, 1985

SUBJECT: Waste Paper - Pesticide Analysis

FROM: Gary Roys

Attached find the results of testing done on waste paepr that was received from a box plant. These boxes were intended to be used for packing of pesticides, particulary, defolatan and paraquat. The paper was analyzed for each and none was found to be present.

cc: B. Buchanan

M. Carlson

J. Blauwkamp

J. Porter

kј

MORSE LABORATORIES, INC.

CHEMICAL ANALYSIS AND RESEARCH

1525 FULTON AVENUE SACRAMENTO. CALIFORNIA 95825 (916) 481-3141

November 14, 1985

Menasha Corporation P. O. Box 155 Otsego, Michigan 49078

Laboratory No. 36379
Date Received 9/27/85

Sample 1 Sample Paper/cardboard for Paraquat and Difolatan

(P.O. #488504)

Difolatan

None detected

Paraquat

None detected

Detection limits; Difolatan = 0.1 ppm Paraquat = 0.05 ppm

MORSE LABORATORIES, INC.

Gary L. Westberg

Director

GLW: db

WAX TESTS

DOCUMENT #18

MAX ANALYSIS: BASE LINE ANALYSIS—AUGUST 1994

SAMPLE	WAX:ppm SAMPLE	WAX;ppm
MEDIUM-REEL1869:8/22	490 KRAFT H.D8/22	587
MEDIUM-REEL1898:8/23	540 KRAFT H.D8/23	436
MEDIUM-REEL1927:8/24	440 KRAFT H.D8/24	456
MEDIUM-REEL1961:8/25	480 KRAFT H.D8/25	480
MEDIUM - REEL1995:8/26	% 600 KRAFT H.D8/26	538

COLD PULPING TRIAL SEPT. 1994

		• •
SAMPLE	WAX:ppm	SAMPLE
MEDIUM-REEL2301:9/6STARTUP	730	KRAFT H.D9/6:345am
MEDIUM - REEL2302:9/6:@	1400	KRAFT H.D9/6:400am
MEDIUM-REEL2303:9/7:@	1500	KRAFT H.D9/7:1145am
MEDIUM - REEL2304:9/7:@	1600	KRAFT H.D9/7:100pm
MEDIUM-REEL2305:9/7:@	1100	KRAFT H.D9/7:530pm
MEDIUM-REEL2311:9/8	770	KRAFT H.D9/8:1015am
MEDIUM-REEL2330:9/9	1100	KRAFT H.D9/9:645am
MEDIUM-REEL2427:9/12	610	KRAFT H.D9/12
MEDIUM-REEL2460:9/13	680	KRAFT H.D9/13
MEDIUM-REEL2489:9/14	580	KRAFT H.D9/14
r' , ' '		-

WAX:ppm	На	TEMP
1235	7.2	78
1592	7.2	80
1617	7.2	96
. 4565	7.4	100
3200	7.4	106
1370	7.6	120
<50	7.3	135
3913	7.0	142
1851	6.8	138
1415	6.9	136

@:100% RECOR

BACTERIAL ANALYSIS

DOCUMENT #19

1

BUCKMAN LABORATORIES, INC.

Memphis, Tennessee

SERVICE REPORT

To:

John Henry

Date: May 5, 1992

John:

Gary Roys and I took samples from both the No. 1 and No. 2 paper machines today to perform the TAPPI T449 microbiological test. Reel numbers 5459 and 8899 were disintegrated and diluted to 1/1000 prior to plating with nutrient agar. Aerobic petri film was also plated to give us a colony or spore comparison. The samples will be taken to my home and incubated for 48 hours. After that time, I will count the number of colonies and relay the data to you and your colleagues. As you know, last week the petri dish counts were to numerous to count. Therefore, we diluted the samples to 1/1000 (last samples were plated at 1/100). However, the aerobic petri film displayed a count of 61,000 colonies (spores) per milliliter of water. This gives us a ball park value of:

61,000 colonies/ml sample X 495 ml water/5.0 gms finished product]=

6,039,000 colonies/gram

This of course was only an estimate and is the highest value you would see since you were down several hours prior to testing. In addition, you were running 100% kraft furnish.

Both white water systems for the No.1 and No.2 paper machines were tested today for fecal coloform bacterium. The test involves spreading 0.10 ml of sample across the surface of Eosin methylene blue agar. The cultures are then incubated at average machine temperatures for 48 hours and counted. The fecal coloforms highly unlikely to be found in your system. I will let you know if there any traces of these organisms.

All materials necessary for testing microorganisms both in the white water and the final product are stocked in your laboratory. Therefore, routine testing will be easier.

A sample was taken today from the number 9 well for analysis of calcium, alkalinity, total hardness, etc. Continuous sampling of this water source will give us some type of idea of what we can expect on a day-to-day basis.

The test results of the scale sample from the No:1 vacuum pump are back and are enclosed. Looking at the percentages we see approximately 15% organic matter (fiber, pitch, additives, etc.) and 85% inorganic (earth and transition metals). The largest inorganic

component is silicon. Which is most likely coming from sand. However, the appearance of the scale does not appear to contain crystalline silicon or sand. As you requested, a scan of sodium on Buckman's Inductively Coupled Plasma instrument will give us the sodium contribution in parts per million. This will tell us if san

is the culprit. If sand is not the problem then we may need to loo at other sources such as, process chemical additives. As you know, many compounds react differently when exposed to high temperatures 140+ Fahrenheit. I will report the sodium data as soon as it is available.

Your current open chemical bin and unopened chemical inventories ar

PRODUCT NAME	APPLICATION POINT SI	GHT GLASS (inches)	FEED RATE (ml/min)
Busperse 231	No.1 PM vacuum pumps	16.5	25
Busperse 231	No.2 PM vacuum pumps	39.5	17
Busperse 47	Recycle loop to reactor	39.75	55

Note: Each are fed continuously.

UNOPENED

Busp. 49 - 4 drums, Busp, 229 - 1 drum, Busp. 47 - 2 tote bins

John, if you or any of your colleagues have any questions or comments about todays service report, please feel free to contact me at:

Home: 219-436-6447
Voice Mail: 800-937-7556
Beeper: 800-999-6710
I.D.# 999-5972
Car: 219-433-6939

Sincerely,

BUCKMAN LABORATORIES, INC.

Donald J. Comparoni District Representative

cc: Tom Oldham
Jack Bray
Paul Jachim
Steve Morse
Al Coleman

Keith Kling Jay Thiessen Dave Merkel Gary Roys Reported By: TM:DJC Date: 04-29-92

Company and Location: MENASHA CORP., OTSEGO, MI

Reference: RLW DATED 04-27-92 Control No: 012380

Sample Received: 04-28-92

Identification of Sample(s): VACUUM PUMP SCALE IN SEAL WATER AREA

Statement of Problem: #1 VACUUM PUMP FOR #1 PM BECAME INOPERABLE

Work Requested: INORGANIC ANALYSIS

Report on Work Done:

Inorganic:

The above sample was dried and ashed; consequently, the elements were converted to the oxide form. ICP analysis of the ash indicated the proof the following:

84.7%
LT 2.3%
1.5%
LT 0.2%
LT 0.2%
LT 0.2%
87.6%
LT 0.2%
3.3%
2.0%
5.3%
LT 0.2%
LT 0.2%

LT = less than

Carbonate spot test was positive.

Analysis of the scale by FTIR did not reveal peaks expected from oxal

This is a rough copy! A formal report is being put together.

Memo

TO:

Jim Porter

FROM:

Paul Jachim

DATE:

May 12, 1992

SUBJECT:

Biological Testing of Otsego Medium

On Tuesday, May 5, a Buckman chemical representative was in to test our medium for bacteria content. Results of that testing showed 33,200 colonies per gram for #1PM and 43,800 colonies per gram on #2PM. Both samples were taken using the TAPPI Procedure 449 with the machines running our normal mixture of recycle and virgin wood furnish. Tests for fecal coliform bacteria showed negative.

This testing procedure will be repeated to develop a feel for repeatability. Extensive efforts to try to determine if an FDA standard for bacteria counts for liner and medium continue to yield negative results. The only standard that we have been able to determine exists is for "milk containing materials". That standard is 250 colonies per gram.

Our direction for this effort will include retesting, gathering data on #1PM during a 100% recycle run, and finally obtaining a proposal from Buckman for biocide treatment to the milk carton standard for the purposes of our evaluation. It is not my intent at this point to treat our system with biocide.

cc:

Keith Kling David Merkel John Henry Gary Roys

PJ:amc

6,000,000 6.2012

1 Flance

FDA

DEPOSIT CHEMICAL ANALYSIS

DOCUMENT #20



ONE NALCO CENTER & NAPERVILLE, ILLINOIS 60563-1198 & AREA 708-305-1000

4-24-93

Cc: tom OlDham

Menasha Corporation 320 N. Farmer St. P.O. Box 155 Otsego, MI 49078

Attention: Mr. John Henry

Subject: Cleaner deposit analysis

Dear John:

FYI. From The Deposits
from The Celleco Clouws.
6-7-93 David During the last down you gave me two deposit samples which were removed from the secondary cleaner system. These samples were analyzed with respect to their chemical makeup and components.

Sample #1

The first sample was described as a sooth light tan color deposit. It was hard and brittle. It was reported to come from the top of a cleaner cone. This deposit shows to be primarily composed of calcium carbonate 82%. With some iron and organic components. Calcium Oxalate was also present.

Nalco recommends either an acid treatment or a caustic boilout using 8651. You should ask your cleaner supplier for his recommendations concerning cleaning of carbonate scale.

Sample #2

The second sample is described as containing both hard and soft deposits in a fibrous sticky brown mass. This deposit was thought to be caused from the above mentioned deposit after it broke away from the cleaner. This however is not the case. Deposit #2 contained less than 2% calcium carbonate with 12% organic. bulk of the deposit contained a mix of components including.

* Coal

* Silicon Oxide (sand or rock)

* Ethylene vinyl acetate

* Polyethylene -

* Styrene-butadiene rubber, other styrene rubbers >

* Polyisoprene _

(1)

Many of these components exist as individual units. I am returning part of the sample with this report. The sample was cleaned of most organic components. These deposits are simply coming through your pre cleaner system. The size of the deposit is what is plugging the cleaner.

Thank you for allowing Nalco to serve you.

Sincerely,

Fred J. Kalakav/

Not sure how we can clean the glastic-based samples out. If this 5till a problem or are we replacing all of the cleaners?

TOLUENE EXTRACTIONS

DOCUMENT #21

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PHENOL TEST

DOCUMENT #22

april 2, 1980 Samples of Kraft stock intermediate chest and white hater were fellered Over a 4 day sample period. The feltate uns sent in for phinal analysis. Kraft stock feltrate - WW! White water